

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Berkeley County
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2012-CP-08-03405

Century Metal Recycling Pvt. LTD
d/b/a CMR America,

Respondent,

v.

Don's Car Crushing, Inc. and
Donald R. Brewer,

Defendants,

Of whom Don's Car Crushing, Inc. is,

Appellant.

RESPONDENT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

YOUNG CLEMENT RIVERS LLP
Stephen L. Brown
Russell G. Hines
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Attorneys for the Respondent

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SC Court of Appeals

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

The Respondent proposes the following to be included in the Record on Appeal:

1. Form 4 Order Denying Defendants' Motion for Relief from Default Judgment;
2. Summons and Complaint with all exhibits, as well as Verification, Affidavit, and Bond;
3. Motion for Entry of Default;
4. Affidavit of Default;
5. Entry of Default;
6. Motion for Default Judgment with all attachments, and transmittal letter to the Court;
7. Judgment by Default against Defendants;
8. Motion for Warrant of Attachment with all exhibits;
9. Warrant of Attachment;
10. Defendants' Motion for Relief to Set Aside Default Judgment;
11. Notice of Filing Affidavit of Rajiv Kaushal filed February 5, 2013 with attached Supplemental Affidavit of Rajiv Kaushal;
12. Notice of Filing Affidavit of Rajiv Kaushal filed August 7, 2013 with attached Affidavit of Rajiv Kaushal; and
13. Appellant's Notice of Appeal.

I certify that this Designation of Matter contains no matter which is irrelevant to this appeal.

<SIGNED ON THE FOLLOWING PAGE>

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Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

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Attorneys for the Respondent

Charleston, South Carolina

Dated: 3/7/14

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PROOF OF SERVICE

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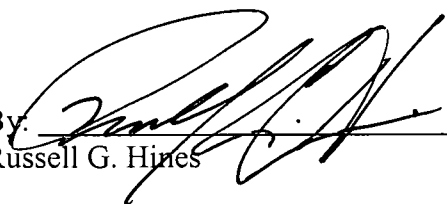
SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for the Respondent herein, do hereby certify that a copy of the foregoing **Initial Brief of Respondent** and the **Respondent's Designation of Matter to be Included in the Record on Appeal** was served upon counsel for the Appellant via United States Mail, postage pre-paid, on March 7, 2014, addressed as follows:

Prosser Law Firm, P.A.
John M. Prosser, Jr., Esquire
P.O. Drawer 779
Johnsonville, SC 29555

Attorney for Don's Car Crushing, Inc., Appellant

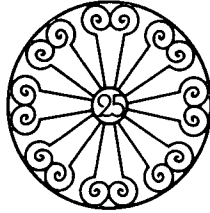
YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 3/7/14

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YCR LAW
Young Clement Rivers, LLP

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March 7, 2014

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *CMR America v. Don's Car Crushing*
Appellate Case No. 2013-002463
Case No.: 2012-CP-08-3405
YCR File: 14977-20120962

Dear Ms. Kitchings:

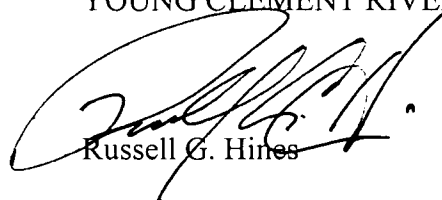
Enclosed for filing in the above referenced matter are the original and two copies of the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal. Also enclosed are the original and two (2) copies of a Proof of Service regarding the same.

Kindly return one clocked copy of each document to us in the pre-stamped envelope provided. Thank you, in advance, for your attention to this request.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/ero
Enclosures
cc: John M. Prosser, Jr., Esquire, Prosser Law Firm, P.A.

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