

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi L. Harrington, Circuit Judge

Case No. 2012-CP-18-2826

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MAR 10 2014

SC Court of Appeals

MONIQUE FRAZIER, individually and on behalf  
of all similarly situated Plaintiffs .....

Appellant

v.

SOMERSET SOUTH CAROLINA, LLC d/b/a/  
SOMERSET APARTMENTS, MULTIFAMILY  
MANAGEMENT, INC. aka MITCHELL  
MANAGEMENT, INC., ALLEN HARKEN,  
KATHI BARFIELD DUCHARME, JOHN DOE  
LEASING AGENTS and JOHN DOE PREMISES  
MANAGERS .....

Respondents.

APPELLANT'S DESIGNATION OF MATTER  
FOR RECORD ON APPEAL

Appellant Monique Frazier hereby designates the following for inclusion in the Record on Appeal:

1. Order, dated January 3, 2014
2. Complaint
3. Amended Answer on behalf of all Defendants
4. Separate Answer on behalf of Defendants Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management, Inc. aka Mitchell Management, Inc., and Kathi Barfield Ducharme
5. Plaintiff's Memorandum in Support of Class Certification, including Exhibits
6. Memorandum of Defendants Somerset South Carolina, LLC and Multifamily Management, Inc. in Opposition to Class Certification

7. Memorandum of Defendants Somerset South Carolina, LLC and Multifamily Management, Inc. in Support of Motion to Dismiss and Compel Arbitration
8. Plaintiff's Memorandum in Opposition to Motion to Dismiss and Compel Arbitration
9. Lease between Monique Frazier and Somerset Apartments, including all addenda
10. Transcript of Hearing, November 12, 2013

Certificate of Counsel

The undersigned hereby certifies that the foregoing Designation of Matter contains no matter which is irrelevant to this appeal.

**ANASTOPOULO LAW FIRM, LLC**



Eric M. Poulin  
S.C. Bar No.: 100209  
Roy T. Willey IV  
S.C. Bar No.: 101010  
2557 Ashley Phosphate Road  
North Charleston, SC 29418  
(843) 614-8888

**ATTORNEYS FOR APPELLANT**

Dated at North Charleston, SC

This 4 day of March, 2014

THE STATE OF SOUTH CAROLINA  
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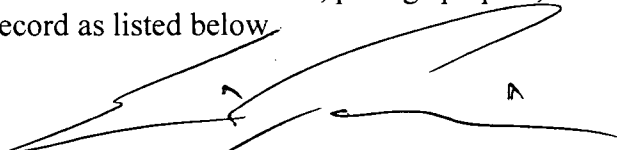
SOMERSET SOUTH CAROLINA, LLC d/b/a/  
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KATHI BARFIELD DUCHARME, JOHN DOE  
LEASING AGENTS and JOHN DOE PREMISES  
MANAGERS .....

Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Initial Brief and Designation of Matter on all parties by depositing a copy of the same in the United States Mail, postage prepaid, on March 4, 2014, addressed to all counsel of record as listed below

March 4, 2014

  
Eric M. Poulin  
Roy T. Willey, IV  
Anastopoulo Law Firm, LLC  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Attorneys for Appellant

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SC Court of Appeals

Other Counsel of Record:

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Steven Wayne Ouzts  
Jonathan Gamble Roquemore  
Turner Padget Graham & Laney, P.A.  
P.O. Box 1473  
Columbia, SC 29202

# **ANASTOPOULO**

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## **LAW FIRM**

Akim A. Anastopoulos (SC)  
Renee M. Anderson (SC)  
Ryan C. Andrews (SC)  
John I. Henderson (SC)  
Eric M. Poulin (GA)(NC)(SC)  
Roy T. Willey, IV (SC)  
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Reply to North Charleston Office  
[eric@akimlawfirm.com](mailto:eric@akimlawfirm.com)

March 04, 2014

The Honorable Jenny Abbot Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RE: *Somerset Apartments Class Action*  
Case No.: 2012-CP-18-2826  
**Tracking No: 2013-002698**

Dear Ms. Kitchings:

Enclosed please find the original and one copy each of Appellant's Initial Brief, Designation of Matter, and Proof of Service of the same on all parties of record.

We would appreciate it if you would file the originals and return the stamped copies in the enclosed envelope. If you should have any questions, please do not hesitate to contact us.

Sincerely,



Eric M. Poulin

Cc: Paul Sperry  
Cc: Andy Lacour  
Cc: Steve Ouzts

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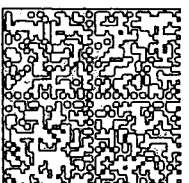
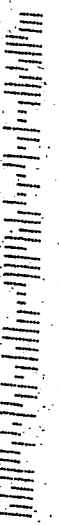
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**SC Court of Appeals**

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Myrtle Beach \* Greenville \* Columbia \* Allendale \* Orangeburg \* Wilmington, North Carolina

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SC Court of Appeals

Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211