

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2012-CP-17-295

Ebony Bethea.....Appellant,

v.

Derrick Jones, John Doe, Individually and
As employee/agent of Citi Trends, Inc., Citi
Trends, Inc., and Palmetto Properties, Inc.

Of Whom Citi Trends, Inc., and Palmetto
Properties, Inc. are.....Respondents.

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

Appellant proposes the following be included in the record on appeal:

1. Summons and Complaint;
2. Citi Trends' Motion for Summary Judgment;
3. Palmetto Property's Motion for Summary Judgment;
4. Plaintiff's Memo in Opposition to Summary Judgment;
5. Order Granting Summary Judgment;
6. Transcript of Summary Judgment Hearing;
7. Deposition of Ivy Council;
8. Deposition of James Holliday;
9. Sworn Statement of Derrick Jones;
10. Affidavit of Michael Hodge;
11. "Safety Handbook" (Exhibit C to Plaintiff's Memo in Opposition);
12. "Store Training Manual" (Exhibit D to Plaintiff's Memo in Opposition);

RECEIVED

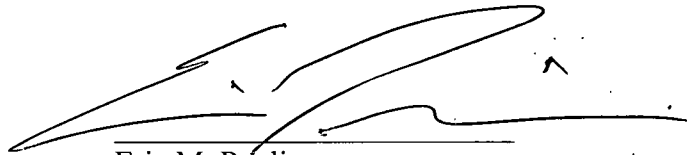
MAY 02 2014

SC Court of Appeals

13. "Loss Prevention New Site Survey" (Exhibit E to Plaintiff's Memo in Opposition);
14. "Incident Report and Narrative" (Exhibit F to Plaintiff's Memo in Opposition).

I certify that this designation contains no matter which is irrelevant to this appeal.

April 28, 2014



Eric M. Poulin
S.C. Bar No.: 100209
Anastopoulo Law Firm, LLC
2557 Ashley Phosphate Road
North Charleston, SC 29418

Attorney for Appellants

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

RECEIVED

MAY 02 2014

SC Court of Appeals

Case No. 2012-CP-17-295

Ebony Bethea.....Appellant,

v.

Derrick Jones, John Doe, Individually and
As employee/agent of Citi Trends, Inc., Citi
Trends, Inc., and Palmetto Properties, Inc.

Of Whom Citi Trends, Inc., and Palmetto
Properties, Inc. are.....Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Initial Brief and Designation of matter on Citi Trends, Inc. and Palmetto Properties, Inc. by depositing a copy of it in the United States Mail, postage prepaid, on April 28, 2014, addressed to their attorneys of record as shown below.

April 28, 2014



Eric M. Poulin
Anastopoulo Law Firm, LLC
2557 Ashley Phosphate Road
North Charleston, SC 29418
(843) 614-8888

ATTORNEYS FOR APPELLANT

Counsel of Record for Respondents:

Catherine G. Griffin
Baker, Ravenel, Bender
P.O. Box 8057
Columbia, SC 29202
(803) 799-9091

FOR RESPONDENT CITI TRENDS

Robert W. Buffington
Haynsworth Sinkler Boyd, P.A.
Post Office Box 340
Charleston, SC 29402
(843) 722-3366

FOR RESPONDENT PALMETTO PROPERTIES

ANASTOPOULO

LAW FIRM

Akim A. Anastopoulos (SC)
Renee M. Anderson (SC)
Ryan C. Andrews (SC)
John I. Henderson (SC)
Marianthe L. Kolokithas (SC)
Eric M. Poulin (GA)(NC)(SC)
Casey Van Valkenburgh (SC)
Roy T. Willey, IV (SC)
Thomas Bailey Smith (SC)*
*Affiliate Counsel

Toll Free: 1 (800) 313-2546
Facsimile: (843) 853-2291

Reply to North Charleston Office
Roy@akimlawfirm.com

April 28, 2014

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

RE: *Ebony Bethea v. Derrick Jones, Citi Trends, Inc., et al.*
Case No.: 2012-CP-17-295
Appellate Tracking No.: 2014-000332

Dear Ms. Kitchings:

Enclosed please find the original and one copy each of the following: Appellant's Initial Brief; Appellant's Designation of Matter; and Proof of Service of both upon the Respondents.

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

Sincerely,



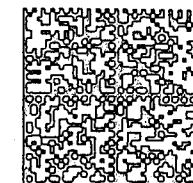
Eric M. Poulin

Cc: Catherine Griffin
Cc: Bobby Buffington

Mailing: 2557 Ashley Phosphate Road, North Charleston, South Carolina 29418
Pee Dee: 150 W. Evans Street, Florence, South Carolina 29501

Appointment Only: Myrtle Beach * Columbia * Orangeburg * Wilmington, North Carolina

Eric M. Poulin
Anastopoulo Law Firm, LLC
2557 Ashley Phosphate Road
North Charleston, SC 29418



US POSTAGE
\$03.08⁹
Mailed From 29418
04/28/2014
031A 0002185011

RECEIVED

MAY 02 2014

SC Court of Appeals

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