

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SEP 12 2014

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge

Case No.: 2011-CP-07-0001

Arthur Washington, Appellant,

-v-

Resort Services, Inc. and John Doe, Respondents.

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

Appellant designates the following items for inclusion in the Record on Appeal,
in addition to the materials designated by the Respondent.

- 1) Order Granting Respondent John Doe's Motion to Dismiss and Denying Plaintiff's Motion for Default Judgment filed May 2, 2014;
- 2) Order Denying Appellant's Motion to Alter or Amend Order filed June 4, 2014;
- 3) Order allowing Appellant to File Amended Complaint filed April 20, 2012;
- 4) Appellant's Motion to Alter or Amend Pursuant to Rules 52(B) and 59(E), SCRPC, filed May 9, 2014;
- 5) Appellant's Motion for Entry of Default and Affidavit of Default filed March 28, 2014;
- 6) Appellant's Motion to Amend Complaint filed March 12, 2012;

- 7) Defendant John Doe's Motion to Dismiss based on Statute of Limitations dated February 10, 2014;
- 8) Memorandum of Law in Support of Appellant's Motion to Alter or Amend filed May 9, 2014;
- 9) Memorandum of Law in Support of Respondent John Doe's Motion to Dismiss Based on the Statute of Limitations, dated March 25, 2014;
- 10) Respondent 21st Century Insurance Company's Motion to Compel dated August 23, 2011;
- 11) Summons and Complaint filed January 3, 2011;
- 12) Amended Summons and Complaint filed August 2, 2012;
- 13) Resort Services Answer to Complaint dated January 25, 2011;
- 14) Resort Services Amended Answer dated April 4, 2011;
- 15) 21st Century Insurance Company's Notice of Appearance dated March 15, 2011;
- 16) Letter of April 16, 2014 to Judge Kinard with Plaintiff's proposed order denying Respondent, John Doe's Motion to Dismiss;
- 17) Motions Hearing Transcript from April 8, 2014
- 18) Arthur Washington Deposition Testimony from November 18, 2011;
- 19) Letter of July 9, 2014 from Barnes to Court Reporter Hill requesting complete transcript;
- 20) Letter of June 27, 2014 from Barnes to Clerk of Court Roseneau filing copy of Notice of Appeal;
- 21) Letter of June 27, 2014 from Barnes to Clerk, SC Court of Appeals filing Notice of Appeal;
- 22) Letter of July 22, 2014 from Barnes to Clerk, SC Court of Appeals – advising transcript received;
- 23) Notice of Appeal filed June 30, 2014

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

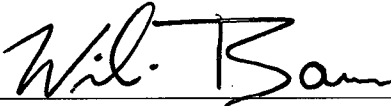
Respectfully submitted,

Charles E. Houston, Jr., Esquire
THE HOUSTON LAW FIRM, LLC
31 Marshland Road
Hilton Head Island, SC 29926

-And-

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

September 9, 2014
Hampton, South Carolina

BY: 
William F. Barnes, III
101 Mulberry Street, East
Post Office Box 457
Hampton, SC 29924
Phone: (803) 943-2111
ATTORNEYS FOR APPELLANT

CERTIFICATE OF SERVICE

This is to certify that I, **Megan C. Davis**, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within **APPELLANTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** to:

Helen F. Hiser, Esquire
Robert R. Sansbury, III, Esquire
McANGUS GOUDELOCK & COURIE, LLC
Post Office Box 650007
Mt. Pleasant, SC 29465

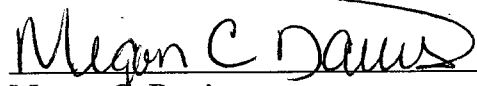
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Charleston, SC 29492

ATTORNEYS FOR RESPONDENTS

Re: *Arthur Washington v. Resort Services, Inc. and John Doe*
Case No. 2011-CP-07-0001
Appellate Case No.: 2014-001409

September 9th, 2014
Hampton, South Carolina


Megan C. Davis

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Case No.: 2011-CP-07-0001

Arthur Washington, Appellant,

-v-

Resort Services, Inc. and John Doe, Respondents.

PROOF OF SERVICE

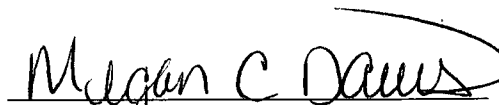
This is to certify that I, *Megan C. Davis*, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid; a true and correct copy of the within **INITIAL BRIEF OF APPELLANT and DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** to:

Helen F. Hiser, Esquire
Robert R. Sansbury, III, Esquire
McANGUS GOUDELOCK & COURIE, LLC
Post Office Box 650007
Mt. Pleasant, SC 29465

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Megan C. Davis

September 9th, 2014
Hampton, South Carolina

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September 9, 2014

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The Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
Post Office Box 11629
Columbia, SC 29211-1629

Re: Washington v. Resort Services, Inc., et al.
Civil Action No.: 2011-CP-07-0001
Appellate Case No. 2014-001409

Dear Ms. Kitchings:

Please find enclosed the original and two copies of *Appellant's Initial Brief, Designation of Matter to be Included in the Record on Appeal*, and *Certificates of Service* in the above referenced matter. Please file the originals and return clocked-in copies of each in the envelope provided.

By copy of this letter, Appellant's Initial Brief and Designation of Matter are being served on all counsel of record.

With kind regards, I am

Sincerely,



William F. Barnes, III

WFB/mcd
Enclosures as stated

cc: Helen F. Hiser, Esquire/Robert R. Sansbury, III, Esquire
Alice P. Adams, Esquire
Christopher W. Nickels, Esquire

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