

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SEP 24 2014

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Doyet A. Early, III, Circuit Court Judge

Case No. 2012-CP-02-01772

Coves Darden, LLC

Appellant

vs

Francisco Jose Garcia Ibanez, Dori Derr,
and Half Moon Stables, LLC

Respondents

**RESPONDENTS' DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents propose the following be included in the Record on Appeal:

1. Order Granting Summary Judgment dated December 5, 2013;
2. Plaintiff's Motion for Reconsideration dated December 29, 2013;
3. Appellant's Initial Brief dated August 7, 2014;
4. Plaintiff's Summons and Complaint;
5. Plaintiff's Response to Defendant's Interrogatories Number 6, dated October 26, 2013;
6. Transcript of March 5, 2013 Circuit Court Hearing;
7. Transcript of May 20, 2013 Circuit Court Hearing;
8. Transcript of October 13, 2013 Circuit Court Hearing;
9. Brief of Plaintiff in Opposition to Defendant's Renewed Motion for Summary Judgment dated May 14, 2013, p.48;
10. Supplementation to Plaintiff's Responses to Interrogatories Number 1, dated October 9, 2013.
11. Plaintiff's Response to Defendant's Requests for Production Number 1, dated October 26, 2012 (Actual exhibit produced by email on October 29, 2012 titled "Evidence of

- Employment Agreement Between Petitioner and Beneficiary”).
12. Affidavit of Miguel Coves;
13. Affidavit of Michael Liberatore.

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

Respectfully submitted

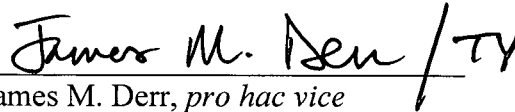
September 22, 2014



Tom Young, Jr.
Law Offices of Tom Young, Jr., PC
P.O. Box 651
Aiken, SC 29802
(803) 649-0000
tyoung@tomyounglaw.com

Respectfully submitted,

September 22, 2014



James M. Derr, *pro hac vice*
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St. Thomas, VI 00804
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jimderrlaw@gmail.com

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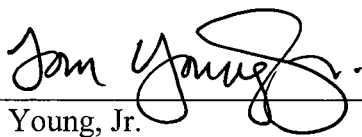
Francisco Jose Garcia Ibanez, Dori Derr,
and Half Moon Stables, LLC

Respondents

CERTIFICATE OF SERVICE

I, Tom Young, Jr., do hereby certify that I have, on September 22, 2014, serviced the foregoing **Respondent's Designation of Matter To Be Included In the Record on Appeal** upon Appellant or attorney(s) for the Appellant by causing a copy thereof to be mailed with proper postage to the address indicated below:

M. Baron Stanton, Esquire
Attorney for Appellant
P.O. Box 245
Columbia, SC 29202



Tom Young, Jr.

Date: 9/22/14

LAW OFFICES OF TOM YOUNG, JR., PC

TOM YOUNG, JR.
ANDREW WALDEN



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September 22, 2014

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

In re: Coves Darden, LLC, Appellant v Francisco Ibanez, Dori Derr and Half Moon
Stables, LLC, Respondents
Appellate Case No. 2014-000339

Dear Ms. Kitchings:

Please find enclosed the **Respondents' Designation of Matter To Be Included In the Record On Appeal** in the above referenced matter along with our proof of service.

If you have any questions, please do not hesitate to contact our office at (803) 649-0000.
Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in black ink that reads "Tom".

Tom Young, Jr.

TY:esh
Enclosures

c: M. Baron Stanton, Esquire
James M. Derr, Esquire

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Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211-1629