

THE STATE OF THE SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Thomas L. Houghston, Jr., Circuit Court Judge

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Case No.: 2012-206986

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Kristin A. Busillo, .....Respondent,

v.

City of North Charleston,.....Appellant.

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**RESPONDENT'S DESIGNATION OF MATTER**

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Keith Robinson  
Attorney for Respondent  
P.O. Box 70306  
North Charleston, SC 29415  
(843) 747-2455  
Attorney for the Respondent

Respondent proposes the following to be included in the Record on Appeal in the above referenced matter:

1. Judge Houghston's Order with Jury Verdict for Plaintiff, November 7, 2011.
2. Judge Houghston's Order Denying Defendant's Post- Trial Motions, December 13, 2011.
3. Complaint.
4. Answer.
5. Arbitration Forums, Inc. Automobile Decision, dated April 19, 2011.
6. Defendant's Motion in Limine and Court's rulings, Tr. pp.3 - 15.
7. Defendant's Post-Trial Motions.
8. Plaintiff's Memorandum in Response to Defendant Post Trial Motions, with attached email.
9. Notice of Appeal, January 9, 2012.
10. Letters 8/24/2010 and 9/8/2010 QBE Insurance
11. Comparative Negligence Jury Charge (Transcript p.143-146)
12. No Objection to Jury Verdict Form (Transcript p. 148 In.6-12)
13. Testimony Kristen Busillo (Transcript p. 31, In 2-8)
14. Testimony witness Terrell Palmer (Transcript p. 67, In 21-23, p. 68, In 5-8)
15. Testimony, Officer Ryan Terrell ( Transcript p. 87, In 17-18- p. 84, In.3-12)
16. Closing Argument (Transcript p. 119 In. 1-2)

I certify, as counsel for Respondent that this designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted,



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Keith Robinson  
Attorney for Respondent  
P.O. Box 70306  
North Charleston, SC 29415  
(843) 747-2455  
Attorney for the Respondent

6-21, 2012

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JUN 25 2012

COURT of Appeals

Kristin A. Busillo, ..... Respondent,

v.

City of North Charleston, ..... Appellant.

PROOF OF SERVICE

I certify that I have served the Initial Brief and Designation of Matter on Appellant by depositing a copy of it in the United States Mail, postage prepaid, on June 21, 2012 addresses to the attorney of record, Keith Robinson, P.O. Box 70306, Charleston, South Carolina 29422.

Respectfully Submitted,



Keith Robinson  
Attorney for Respondent  
P.O. Box 70306  
North Charleston, SC 29415  
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6-21, 2012

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June 21, 2012

Honorable Tanya A. Gee  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

RE: Kristin Busillo v. City of North Charleston  
Case No.: 2012-206986

**RECEIVED**

JUN 25 2012

**SC Court of Appeals**

Dear Judge Gee:

Enclosed in an original and copy of Respondent's Initial Brief and Designation of Matter along with the Proof of Service in the above-referenced matter. Please return a file stamped copy to me in the enclosed envelope. By copy of this letter to Appellant's attorney, I am serving Appellant with these documents.

If you have any questions, please contact me at (843) 747-2455.

Sincerely,



Keith Robinson  
Attorney at Law

Enclosure

CC: Christopher Dorsel, Esq

William A. Green

Samuel B. Cooper, Jr.

R. Anthony Russo

Keith Robinson

Bradd W. Bunce