

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Honorable J. Ernest Kinard, Jr., Circuit Court Judge

Case No.: 2011-CP-07-0001

Arthur Washington, Appellant,

v.

Resort Services, Inc., and John Doe, Respondents.

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

Respondent John Doe proposes the following be included in the Record on Appeal:

1. Order Granting Defendant John Doe's Motion to Dismiss and Denying Plaintiff's Motion for Default Judgment, filed May 2, 2014;
2. Order Denying Plaintiff's Motion to Alter or Amend Order, filed June 4, 2014;
3. Summons and Complaint, filed January 3, 2011;
4. Answer of Resort Services Inc., filed January 27, 2011), and an Amended Answer on April 18, 2011;
5. Amended Answer of Resort Services, filed April 18, 2011;
6. Notice of Appearance and Conditional Answer (Jury Trial Demanded), dated March 14, 2011;
7. Motion to Amend Complaint, filed March 12, 2012;
8. Amended Complaint, filed August 2, 2012;

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9. Service letter from Raymond G. Farmer, Director, Department of Insurance, to 21st Century Insurance Company, dated January 31, 2014;
10. Answer to Amended Complaint on Behalf of John Doe, filed February 11, 2014;
11. Defendant John Doe's Notice of Motion and Motion to Dismiss Based on the Statute of Limitations, filed February 12, 2014;
12. Memorandum in Support of Defendant John Doe's Motion to Dismiss Based on the Statute of Limitations, filed April 8, 2014;
13. Motion for Entry of Default, Rule 55, SCRPC, filed March 28, 2014;
14. Defendant John Doe's Memorandum in Opposition to Plaintiff's Motion for Default Judgment, filed March 14, 2014;
15. Plaintiff's Motion to Alter or Amend Pursuant to Rules 52(b) and 59(e), SCRPC, dated May 7, 2014;
16. Email from Robert Sansbury to Judge Kinard, *et al.*, dated May 9, 2014;
17. Transcript of Hearing before the Honorable Ernest Kinard on April 8, 2014, pp. 1-9; and,
18. Transcript of deposition of Arthur Washington, taken November 18, 2011, pp. 35, 40, 44-46.

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

November 11, 2014

McANGUS GOUDELOCK & COURIE LLC



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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable J. Ernest Kinard, Jr., Circuit Court Judge

Case No. 2011-CP-70-0001

Arthur Washington, Appellant,

v.

Resort Services, Inc., and John Doe, Respondents.

PROOF OF SERVICE

I certify that I have served the **Initial Brief of Respondent John Doe** and **Designation of Matter to be Included in the Record on Appeal** on Arthur Washington, by depositing a copy of it in the United States Mail, postage prepaid, on the 10th day of November, 2014, addressed to his attorney and to other counsel of record as follows:

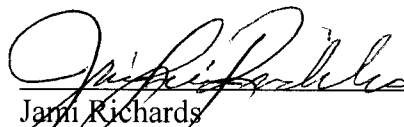
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November 10, 2014



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Reply To

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November 10, 2014

Via U.S. Mail

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

RE: Arthur Washington v. Resort Services, Inc. and John Doe
Civil Action No.: 2011-CP-07-0001 (Beaufort)
Date of Incident: February 26, 2009
Carrier Claim No.: 8003223803-1-3
MGC File No.: 20192.14002
Appeal No.: 2014-001409

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

1. original and one copy of the Initial Brief of Respondent John Doe;
2. original and one copy of the Designation of Matter to be Included in the Record on Appeal; and
3. original and one copy of Respondent John Doe's Proof of Service concerning items one and two.

Please file these documents and return the clocked-in copies in the enclosed, self-addressed stamped envelope.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: Charles E. Houston, Jr., Esq.
William F. Barnes, III, Esq.

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The Honorable Jenny Abbott Kitchings
November 10, 2014
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