

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM CHESTER COUNTY  
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

RECEIVED

JUN 29 2012

SC Court of Appeals

Case No. 2010-CP-12-0168

Mell Woods ..... Appellant,

v.

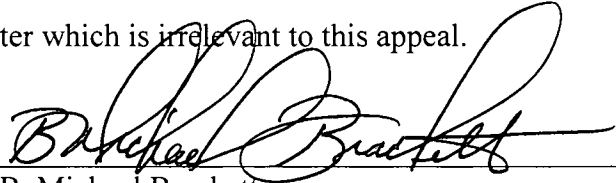
Robert H. Breakfield, Esquire, as Personal Representative  
of the Estate of Reba Hinson ..... Respondent.

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

B. Michael Brackett, S.C. Bar # 838  
Moses & Brackett, PC  
P.O. Box 100261  
Columbia, SC 29202  
803.461.2312  
Attorney for Respondent

13. Appellant's Motion to Amend and Motion for Reconsideration, each dated November 9, 2010;
14. Appellant's Motion for Reconsideration dated March 11, 2011;
15. Affidavit of Howard Steen;
16. Affidavit of Mike Johnson;
17. Transcript of February 2, 2011 motions hearing;
18. Respondent's Motion for Summary Judgment on Appellant's nuisance claim;
19. Appellant's Response/Affidavit to Respondent's Summary Judgment Motion dated January 29, 2011;
20. Respondent's Affidavit filed February 2, 2011 in Opposition to Appellant's Motion to Amend, including 7 incorporated exhibits;
21. Pages 7, 8, 32 and 48 from Appellant's deposition transcript;
22. Levie Hinson Last Will, Exhibit 5 from Appellant's deposition transcript;
23. Lease, Exhibit 10 from Appellant's deposition transcript;
24. Judge Goldsmith Order Granting Summary Judgment, dated December 29, 2011, in case no. 2011-CP-12-0323.
25. Reba Hinson last will dated June 23, 1998;
26. Reba Hinson last will (signed) dated April 5, 2003;
27. Reba Hinson last will (unsigned) dated April 5, 2003.

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

A handwritten signature in black ink, appearing to read "B. Michael Brackett", written over a horizontal line.

B. Michael Brackett  
Moses & Brackett, PC  
P. O. Box 100261  
Columbia, SC 29202  
803.461.2312  
Attorney for Respondent

June 28, 2012

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

COUNTY OF CHESTER

2010-CP-12-0168

IN THE MATTER OF: THE ESTATE  
OF REBA P. HINSON, PETITION FOR  
ALLOWANCE OF CLAIM

Mell Woods,

CERTIFICATE OF SERVICE

Plaintiff-Claimant,

v.

Robert H. Breakfield, as Personal  
Representative of the Estate of  
Reba P. Hinson,

Defendant

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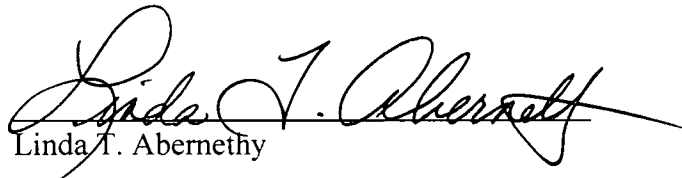
JUN 29 2012

SC Court of Appeals

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I, Linda T. Abernethy, Legal Assistant to B. Michael Brackett, Esquire, attorney for the Defendant in the above-captioned matter, do hereby certify that I have served the Plaintiff, Mell Woods, with a copy of Respondent's Initial Brief and Respondent's Designation of Matter to be included in the Record on Appeal, postage prepaid and return address clearly indicated on said envelope, on this 28<sup>th</sup> day of June, 2012 at the following address:

Mell Woods  
P. O. Box 2603  
Lancaster, SC 29721  
Plaintiff, pro se

  
Linda T. Abernethy

# MOSES & BRACKETT, PC

ATTORNEYS AND COUNSELORS AT LAW

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Direct Dial: (803) 461-2312  
Email: mbrackett@mkb-law.com

June 28, 2012

The Honorable Tanya A. Gee  
Clerk of Court  
S.C. Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

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SC Court of Appeals

RE: Woods v. Breakfield, as Personal Representative  
2010-CP-12-0168  
Tracking Number - 2011191876  
Our File Number - 12085.1

Dear Ms. Gee;

Enclosed for filing please find the following:

- 1) Respondent's Initial Brief;
- 2) Respondent's Designation of Matter to be included in the Record on Appeal.

By copy of this letter copies of the enclosures are being served upon the Appellant, Mell Woods, who is appearing *pro se*.

Please return a clocked face pages of the enclosures using the envelope provided.

Very truly yours,



B. Michael Brackett

BMB/Ita  
Enclosures

cc. Robert H. Breakfield, Esquire  
Mell Woods