

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY  
CIRCUIT COURT

THE HONORABLE J. DERHAM COLE  
CASE NO.: 2010-CP-42-5527

Launeil Sanders, .....Appellant

vs.

Janneth E. Sanders, Spartanburg County, and Burts, Turner and Rhodes, c/o  
Richard Rhodes, .....Respondents

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RESPONDENTS' DESIGNATION OF MATTER ON BEHALF OF  
JANNETH E. SANDERS AND BURTS, TURNER AND RHODES,  
C/O RICHARD RHODES

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Order of Judge Cole dated January 28, 2011

Complaint dated October 15, 2010

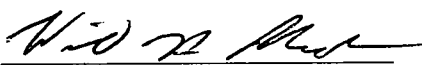
Answer dated October 29, 2010

Motion to Dismiss dated November 2, 2010

Affidavit in Support of Motion dated January 25, 2011

Transcript of Record of Hearing (Pages 1-16) dated January 25, 2011

Burts, Turner & Rhodes  
Attorneys for Janneth E. Sanders and  
Burts, Turner and Rhodes c/o Richard Rhodes  
P.O. Box 3408  
Spartanburg, SC 29304  
(864) 585-8166

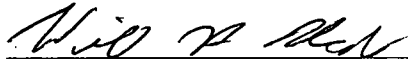
By:   
William H. Rhodes

**RECEIVED**  
JUN 20 2012  
COURT OF APPEALS

June 19, 2012

**CERTIFICATE OF COUNSEL**

This is to certify that the Designation of Matter for the Respondents, Janneth E. Sanders and Burts, Turner and Rhodes c/o Richard Rhodes, contains no matter which is irrelevant to the appeal as required by Rule 209(c).



William H. Rhodes  
Attorney for Janneth E. Sanders and  
Burts, Turner and Rhodes c/o Richard Rhodes

Date: June 19, 2012

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM SPARTANBURG COUNTY  
COURT OF COMMON PLEAS

THE HONORABLE J. DERHAM COLE  
CASE NO. 2010-CP-42-05527

Launeil Sanders,

Appellant,

versus

Janneth E. Sanders, Spartanburg County, Burts, Turner & Rhodes,  
and Richard H. Rhodes

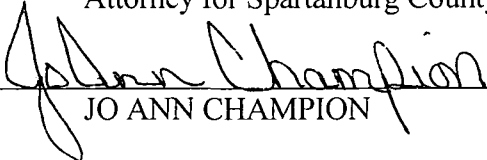
Respondents.

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PROOF OF DELIVERY  
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This is to certify that on the 19<sup>th</sup> day of June, 2012, the undersigned, secretary to William H. Rhodes, Esq., served a copy of the **RESPONDENTS INITIAL BRIEF ON BEHALF OF JANNETH E. SANDERS AND BURTS, TURNER AND RHODES C/O RICHARD RHODES** by depositing a copy of the same into the United States Mail, postage pre-paid and in the correct amount to the following:

Mr. Launeil Sanders, Appellant  
4005 Highway #11  
Inman, SC 29349

William B. Darwin, Jr., Esquire  
P.O. Box 1897  
Spartanburg, SC 29304  
Attorney for Spartanburg County

  
\_\_\_\_\_  
JO ANN CHAMPION

SWORN to before me this 19<sup>th</sup>  
day of June, 2012.

 (SEAL)  
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 1/23/22

**RECEIVED**  
JUN 20 2012  
SC Court of Appeals

BURTS, TURNER & RHODES  
ATTORNEYS AT LAW  
260 NORTH CHURCH STREET  
SPARTANBURG, S.C. 29306

SAM BURTS (1907 - 1982)  
NOEL TURNER (1928 - 2011)  
RICHARD H. RHODES  
M. NOEL TURNER, III  
WILLIAM H. RHODES

RYAN F. McCARTY

MAILING ADDRESS  
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June 19, 2012

Ms. Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Sanders, Launeil v. Sanders, Janneth  
2011191726

Dear Ms. Kitchings:

I am enclosing the following:

1. An original Respondents' Initial Brief on behalf of Janneth E. Sanders and Burts, Turner and Rhodes c/o Richard Rhodes.
2. An original Respondents' Designation of Matter on behalf of Janneth E. Sander and Burts, Turner and Rhodes c/o Richard Rhodes.
3. A Certificate of Counsel for the Designation of Matter.
4. Proofs of Delivery showing service on opposing counsel and Launeil Sanders.

Please do not hesitate to contact me if you should have any questions or require any further information.

Sincerely,



William H. Rhodes

RHR/jc  
Enc.

cc: Mr. Launeil Sanders  
4005 Highway #11  
Inman, SC 29349  
*Pro Se* Appellant

William B. Darwin, Jr., Esquire  
P.O. Box 1897  
Spartanburg, SC 29304  
Attorney for Spartanburg County

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