

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Robert E. Watson, Master-in-Equity

Appellate Case No. 2014-001487

Linda Gibson, formerly known as Linda Ann Avinger
Individually and as Trustee of the Paul William Gibson
Family Trust, and Heritage Seven, LLC,

Respondents

v.

Ameris Bank,

Appellant.

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SC Court of Appeals

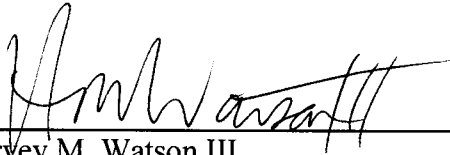
RESPONDENT'S DESIGNATIONS

Pursuant to Rule 209, SCACR, in addition to those matters as have been designated by Appellant, Respondents designate the following additional matter. Respondents reserve the right to designate additional matters of record in response to the Initial Appellant's Reply Brief. Unless otherwise stated, all items designated exclude cover sheets, certificates or proof of service and exhibits to designated items.

1. Trial transcript: Pp. 242-249; pp. 252-257; p. 486; pp. 504-532.

2. Respondent's (Plaintiff's) trial exhibits No. 8, 22, 23, 30, 32, 37, 38, 39, 41, 61, 67, 68, 71.
3. Plaintiff's Brief on Damages filed February 7, 2013.
4. Court's Exhibit No. 7, Deposition of Lanier p. 216.

The undersigned certifies that the designations of Respondents do not contain any matter that is irrelevant to the appeal.



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ATTORNEYS FOR RESPONDENTS

February 9, 2015

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Robert E. Watson, Master-in-Equity

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CERTIFICATE OF SERVICE

I, Beth Cogan, an employee with Ballard & Watson, Attorneys at Law, do hereby certify that on February 9, 2015, I served a copy of the **Respondent's Initial Brief** and **Respondent's Designation of Matter** in the above-captioned case on the following individual by electronic mail and by United States Mail, with sufficient first-class postage affixed, addressed as follows:

Robert E. Stepp, Esquire
rstepp@sowellgray.com
Sowell Gray Stepp & Laffitte, LLC
Post Office Box 11449
Columbia, South Carolina 29211

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Beth Cogan, Paralegal

February 9, 2015
West Columbia, South Carolina



Ballard & Watson
Attorneys at Law
PERSISTENT. UNWAVERING.

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February 9, 2015

Via Hand-Delivery
Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

Re: *Linda Gibson v. Ameris Bank*
Appellate Case No: 2014-001487

Dear Ms. Kitchings:

Please find enclosed for filing an original and one (2) copies of the **Respondent's Initial Brief** in the above-referenced matter. Also enclosed are an original and one copy of **Respondent's Designation of Matter** pursuant to Rule 209, SCACR. After both have been filed, please return the clocked copies to our office in the enclosed, self-addressed, stamped envelope.

Please do not hesitate to contact our office if you should have any questions. With warm personal regards, I am,

Sincerely yours,

Harvey M. Watson III
harvey@desaballard.com

cc: *Via U.S. Mail and Email*
Robert E. Stepp, Esq.
Tina Cundari, Esq.