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IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED  
MAR 09 2015  
SC Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Case No. 2014-002410

Raymond D. Hobby ..... Respondent

vs.

Mary T. Hobby ..... Appellant

vs.

Frances B.B. Knowlton, individually and as trustee ..... Respondent

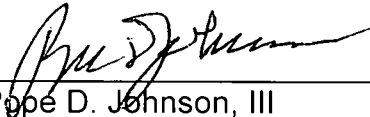
**APPELLANT'S DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

Appellant proposes the following be included in the Record on Appeal:

1. Complaint dated April 25, 2013
2. Ms. Hobby's Answer dated May 8, 2013
3. Ms. Hobby's Amended Answer, Counterclaim and Third Party Complaint dated June 7, 2013
4. First Amended Complaint dated June 12, 2013

5. Answer and Counterclaim of Frances B. Knowlton dated June 26, 2013
6. Defendant and Third Party Plaintiff's Reply to Counterclaim of Third Party Defendant dated July 1, 2013
7. Ms. Hobby's Answer to Amended Complaint, Counterclaim and Third Party Complaint dated September 6, 2013
8. Answer and Counterclaim of Frances B. Knowlton to the Amended Complaint, Counterclaim and Third Party Complaint dated September 10, 2013
9. Ms. Hobby's Reply to Counterclaim of Third Party Defendant dated September 16, 2013
10. Mr. Hobby's Reply to Defendant's Counterclaim dated October 7, 2013
11. Mr. Hobby's Motion for Partial Summary Judgment dated July 8, 2013
12. Ms. Hobby's Motion for Summary Judgment dated September 19, 2013
13. Trustee's Motion for Summary Judgment dated December 23, 2013
14. Ms. Hobby's Memorandum in Opposition to Plaintiff's Motion for Summary Judgment dated March 12, 2014
15. Ms. Hobby's Motion to Alter or Amend and/or to Reconsider dated May 23, 2014
16. Affidavit of John O. McDougall dated September 19, 2013
17. Affidavit of Arthur E. White, III dated September 19, 2013
18. Affidavit of Julian W. Walker, Jr. dated December 23, 2013
19. Affidavit of Frances B.B. Knowlton dated December 23, 2013
20. Supplemental Affidavit of John O. McDougall dated March 10, 2014
21. Affidavit of Pope D. Johnson, III dated March 11, 2014
22. Notice of Appeal dated October 27, 2014, with Orders dated May 6, 2014 and October 17, 2014

23. Transcript of Record for March 12, 2014 and October 17, 2014, pp.3-77



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**Attorney for the Appellant**

Columbia, South Carolina  
March 9, 2015

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**CERTIFICATE**

The Designation of Matter contains no matter which is irrelevant to the appeal.

  
Pope D. Johnson, III  
Attorney at Law  
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[pope@popejohnsonlaw.com](mailto:pope@popejohnsonlaw.com)  
**Attorney for the Appellant**

Columbia, South Carolina  
March 9, 2015

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**PROOF OF SERVICE**

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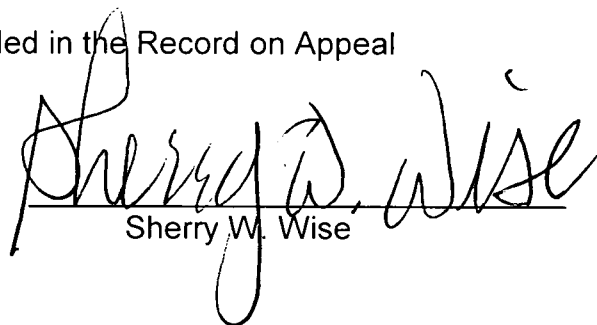
I, Sherry W. Wise, of Pope D. Johnson, III, Attorney at Law, hereby certify that I have served Benjamin C. Bruner, attorney for Respondent Raymond D. Hobby, and R. Davis Howser, attorney for Respondent Frances B. Knowlton, with the following pleadings by mailing a copy of same, postage prepaid and return address clearly indicated, to them at the following addresses on the 9th day of March, 2015.

**COUNSEL SERVED:**  
Benjamin C. Bruner, Esquire  
Bruner Powell Wall & Mullins, LLC  
P.O. Box 61110  
Columbia, SC 29260-1110

R. Davis Howser, Esquire  
Howser Newman & Besley, LLC  
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**PLEADINGS:**

Appellant's Designation of Matter to be Included in the Record on Appeal

  
Sherry W. Wise

POPE D. JOHNSON, III  
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March 9, 2015

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**(Via Hand Delivery)**

Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201


RE: Raymond D. Hobby v. Mary T. Hobby v. Frances B.B. Knowlton  
Case No. 2014-002410

Dear Ms. Kitchings:

Enclosed herewith are the original and a copy of Appellant's Initial Brief and Appellant's Designation of Matter to be Included in Record on Appeal regarding the above-referenced action. Please file the originals and clock and return the additional copy of each to me.

With a copy of this letter to Benjamin C. Bruner, attorney for Respondent Raymond D. Hobby, and R. Davis Howser, attorney for Respondent Frances B.B. Knowlton, I am serving a copy of the Initial Brief and Designation of Matter upon them.

Sincerely,

  
Pope D. Johnson, III

PDJIII/sww  
Enclosures

cc: Benjamin C. Bruner, Esquire  
R. Davis Howser, Esquire