

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Case No. 2011-CP-38-1397

William Breland, Respondent,

v.

South Carolina Department of Transportation, Appellant.

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

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

1. Verdict form;
2. Order of 1/13/14;
3. Plaintiff's Exhibits 1, 2, 3, 4, 5, 6, 7, 9, 10, 13-44, 46, 50, 51, 52, 53, 54, 55;
4. Defendant's Exhibits 1-15;
5. Court's Exhibits 2, 3;
6. Transcript pp. 51-55, 67-71, 76-80, 122-124, 128-133, 138, 143-144, 148, 150-152, 154-158, 163, 165, 173-208, 217-220, 222, 224-237, 238-239, 241, 243-245, 248-253, 260, 261-271, 273-274, 276, 278, 281, 286, 290-291, 293, 298-307, 309-310, 314, 316-321, 323-324, 328-330, 344-362, 382-385, 401-402, 420-421, 426-427, 429-431, 433, 440, 442, 480-483, 485-486, 505-509, 515-517;
7. Mummaneni Deposition Transcript. pp. 4-6, 7, 9-14, 19-38, 59, 70-71, 80, 85-88, 90-92.

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

/Signature page attached

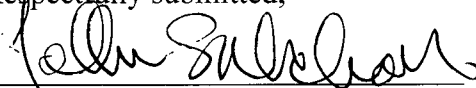
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APR 21 2015

SC Court of Appeals

April 21, 2015

Respectfully submitted,



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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant with a copy of the *Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Richard B. Ness
Alison D. Hood
Norma Anne Turner Jett
Adam C. Ness
NESS & JETT, LLC
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Erin Bridges

Erin Bridges
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC



April 21, 2015

VIA HAND DELIVERY

Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: William Breland v. South Carolina Department of Transportation
Case Tracking No.: 2014-000168

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of the *Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal* in regards to this case. I have also enclosed a proof of service of this document on counsel for the Appellant. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to John S. Nichols
BLUESTEIN, NICHOLS, THOMPSON &
DELGADO, LLC

/emb

Enclosures

cc: J. Christopher Wilson, Esquire
Richard B. Ness, Esquire
Alison D. Hood, Esquire
Norma Anne Turner Jett, Esquire
Adam C. Ness, Esquire

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