

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APR 21 2015

APPEAL FROM THE COURT OF COMMON PLEAS OF THE COUNTY OF  
W. Jeffery Young, Circuit Court Judge

**SC Court of Appeals**

Appellate Case No. 2014-0002451

Ernestine N. Palmer, as Trustee of the  
Article IV Trust created under the Will of  
Mary Denman Newman, deceased, Ronald  
O. Palmer, Ernestine N. Palmer, as Trustee  
of the Article IV Trust created under the  
Will of James E. Newman, deceased,

Respondents,

v.

Hatcham Gove Inc., and David H. Lucas,

Appellants.

DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

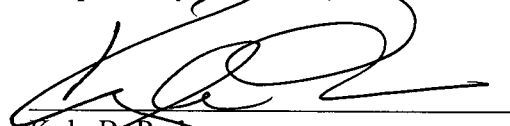
Respondents propose the following to be included in the Record on Appeal:

1. Complaint in Civil Action No. 2013-CP-31-00130, filed July 9, 2013.
2. Answer, Counterclaims and Third-Party Complaint of Defendants, filed September 30, 2013.
3. Plaintiffs' Reply to Counterclaims filed November 1, 2013.
4. Consent Order Realigning Parties, filed November 20, 2013.
5. Defendants' Answers to Plaintiffs' First Set of Interrogatories dated April 30, 2014.
6. Defendants' Supplemental Answers to Plaintiffs' First Set of Interrogatories dated June 10, 2014.

7. Plaintiffs' Motion for Partial Summary Judgment filed May 22, 2014
8. Transcript of Deposition of David H. Lucas of August 1, 2014.
9. Memorandum in Support of Motion for Additional Time to Respond to Defendants Request for Admission, or, in the Alternative, Motion to Withdraw or Amend Under Rule 36(b) dated September 11, 2015.
10. Transcript of Hearing held on September 12, 2014.
11. Order Granting Plaintiffs Motions for Summary Judgment and for Additional Time to Respond to Defendants' Requests for Admission, or in the Alternative, Motion to Withdraw or Amend under Rule 36(b) and Denying Defendants' Motion for Summary Judgment, filed October 15, 2014.
12. Notice of Appeal , filed November 10, 2014.

The undersigned hereby certifies that the foregoing designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,



Kyle B. Parker  
POPE & HUDGENS ATTORNEYS, P.A.  
1508 College Street  
Newberry, SC 29108  
Phone (803) 948-9263  
Fax (803) 276-8684

Newberry, South Carolina  
April 20, 2015

Attorneys for Respondent

Opposing Counsel:

Magalie Arcure, Esq.  
Finkel Law Firm  
4000 Faber Place Drive  
North Charleston, South Carolina 29405  
Phone: (843) 577-5460  
Fax: (843) 800-7954  
marcure@finkellaw.com

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS OF LEE COUNTY  
W. Jeffery Young, Circuit Court Judge

Appellate Case No. 2014-0002451

Ernestine N. Palmer, as Trustee of the  
Article IV Trust created under the Will of  
Mary Denman Newman, deceased, Ronald  
O. Palmer, Ernestine N. Palmer, as Trustee  
of the Article IV Trust created under the  
Will of James E. Newman, deceased,

Respondents,

v.

Hatcham Gove Inc., and David H. Lucas,

Appellants.

PROOF OF SERVICE


I certify that I have served a copy of the Initial Brief of Respondents and Respondents' Designation Of Matters To Be Included In The Record On Appeal on the Appellants by mailing a copy of same via regular United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed to its attorney of record, Magalie Arcure, Esq., Finkel Law Firm, 4000 Faber Place Drive, North Charleston, South Carolina 29405.

**RECEIVED**

APR 21 2015

**SC Court of Appeals**

Newberry, South Carolina  
April 20, 2015

  
Kyle B. Parker  
POPE & HUDGENS ATTORNEYS, P.A.  
1508 College Street  
Newberry, SC 29108  
Phone (803) 948-9263  
Fax (803) 276-8684  
Attorneys for Respondents

THOMAS H. POPE III  
W. CHAD JENKINS  
KYLE B. PARKER

**DOPE  
&  
HUDGENS**  
ATTORNEYS, P.A.

1508 COLLEGE STREET-P.O. BOX 190  
NEWBERRY, SOUTH CAROLINA 29108  
PHONE (803) 276-2532 FAX (803) 276-8684  
WWW.POPEANDHUDGENS.COM

JOSEPH W. HUDGENS  
*Of Counsel*  
THOMAS H. POPE  
(1913-1999)

April 20, 2014

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

Re: Palmer v. Hatcham Grove, Inc., et al.  
Appellate Case No.: 2014-0002451

Dear Ms. Kitchings:

Enclosed please find Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal, along with Proof of Service for the same, in connection with the above referenced matter. Upon filing, please return a clocked copy to me in the self-addressed envelope provided for your convenience (an extra copy of the enclosed pleadings is enclosed for such purpose).

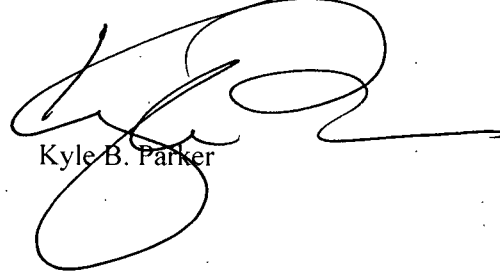
By copy of this letter, I hereby serve a copy of the same upon opposing counsel.

I thank you in advance for your assistance in this matter, and should any questions or concerns, please feel free to give me a call.

With my kindest regards, I am,

Sincerely,

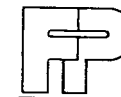
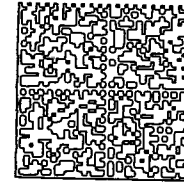
POPE AND HUDGENS, P.A.



Kyle B. Parker

KBP/tem  
Enclosures  
cc: Magalie Arcure, Esquire (w/ enc.)

**RECEIVED**  
APR 21 2015  
SC Court of Appeals



US POSTAGE  
\$ 01.40

Mailed From 29108

04/20/2015

031A 0004187833

## First Class Mail

**DOPE  
&  
HUDGENS**  
ATTORNEYS, P.A.

1508 COLLEGE STREET - P.O. BOX 190  
NEWBERRY, SOUTH CAROLINA 29108

*TO*

Kyle B. Parker, Esq.  
POPE & HUDGENS, P.A.  
P.O. Box 190  
Newberry, SC 29108

FIRST CLASS MAIL