

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2015-000359  
Case No. 2011-CP-42-3951

**RECEIVED**

MAY 05 2015

**SC Court of Appeals**

Dickie Shults, .....Appellant,

v.

Angela G. Miller, .....Respondent.

DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

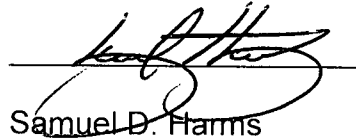
Appellant proposes the following be included in the Record on Appeal:

1. Summons and Complaint (filed 09/13/2011)
2. Motion for Entry of Default by the Clerk of Court and Attachments: Affidavit of Counsel Supporting Motion for Entry of Default and Attachment (filed 10/20/2011)
3. Entry of Default and Setting Case for a Damages Hearing (filed 10/20/2011)
4. Motion to Set Aside the Entry of Default (served October 26, 2011)
5. Answer to Complaint (served October 26, 2011)
6. Affidavit of Frank Miller (filed 11/29/2011)
7. Affidavit of Angela Miller (filed 11/29/11)
8. Affidavit of Chris Mace (filed 12/21/11)
9. S.C. Uniform Collision Report
10. Defendant's Brief in Support of her Motion to Set Aside Entry of Default and attached Exhibits: Affidavit of Frank Miller, Affidavit of Angela Miller, Affidavit of Chris Mace, S.C. Uniform Collision Report (exhibits previously included)
11. Transcript of January 3, 2012 Hearing on Defendant's Motion to Set Aside Entry of Default
12. Order Setting Aside Entry of Default (filed 07/11/2012)

13. Motion to Reconsider, Alter or Amend the Order Setting Aside Entry of Default (served July 18, 2012)
14. Deposition of Angela Miller (entire deposition)
15. Deposition of Dickie Shults (entire deposition)
16. Defendant's Motion for Summary Judgment (served 10/31/12)
17. Defendant's Brief in Support of Motion for Summary Judgment with Attached Exhibits: Affidavit of Chris Mace, S.C. Uniform Collision Report, Deposition of Dickie Shults (title page, p. 48)(exhibits previously included)
18. Transcript of February 7, 2013 Hearing on Plaintiff's Motion to Reconsider Order Setting Entry of Default and Defendant's Motion for Summary Judgment
19. Order dated March 18, 2013 denying Plaintiff's Motion to Reconsider and granting the Defendant's Motion for Summary Judgment
20. Plaintiff's Motion to Reconsider, Alter or Amend the Order Granting Defendant's Motion for Summary Judgment. (served 03/22/13)
21. Transcript of October 31, 2013 Hearing on Plaintiff's Motion to Reconsider Order Granting Defendant's Motion for Summary Judgment
22. Form 4 Order filed January 27, 2015 denying Plaintiff's Motion to Reconsider
23. Notice of Appeal and Proof of Service

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

May 1, 2015



Samuel D. Harms  
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33 Market Point Drive  
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Attorney for Appellant

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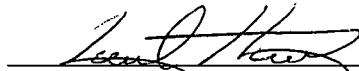
Angela G. Miller, .....Respondent.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant and Designation of Matter to be Included in the Appeal on Angela G. Miller by depositing a copy of it in the United States Mail, postage prepaid, on May 1, 2015, addressed to her attorney of record:

Robert E. Davis, Esq.  
The Ward Law Firm, P.A.  
P.O. Box 5663  
Spartanburg, SC 29304

May 1, 2015



Samuel D. Harms  
Harms Law Firm, P.A.  
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May 1, 2015

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

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**SC Court of Appeals**

RE: Dickie Shults vs. Angela G. Miller  
Appellate Case No. 2015-000359

Dear Ms. Kitchings:

Enclosed for filing is the Initial Brief of Appellant in the above case. Also enclosed are the following:

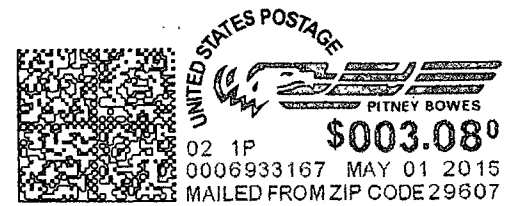
1. Designation of Matter to be Included in the Record on Appeal
2. Proof of Service of the Initial Brief of Appellant and the Designation of Matter to be Included in the Record on Appeal on the Respondent.
3. An additional copy of the above referenced documents. Please stamp the copies and return them to me in the enclosed self-addressed stamped envelope.

Sincerely,

A handwritten signature in black ink, appearing to read 'Samuel D. Harms'. The signature is stylized with a large, looping initial 'S'.

Samuel D. Harms  
Harms Law Firm, P.A.  
33 Market Point Drive  
Greenville, SC 29607  
(864) 277-0102  
Attorney for Appellant

cc: Robert E. Davis, Esq.  
The Ward Law Firm, P.A.  
P.O. Box 5663  
Spartanburg, SC 29304  
Attorney for Respondent



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