

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

JUN 17 2015

SC Court of Appeals

Honorable Robert E. Hood, Circuit Court Judge

Case No. 2014-CP-40-00271

Kerry Paul,

Appellant,

v.

South Carolina Department of Employment and
Workforce,

Respondent.

DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON
APPEAL

Nancy Bloodgood, Esq., SC Bar No. 6459
Lucy C. Sanders, Esq., SC Bar No. 78169
FOSTER LAW FIRM, L.L.C.
895 Island Park Drive, Suite 202
Charleston, SC 29492
Telephone: (843) 972-0313
Facsimile: (888) 519-0934
Email: nbloodgood@fosterfoster.com
lsanders@fosterfoster.com
Attorneys for the Appellant

TO: HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW the Appellant, pursuant to Rule 209 of the South Carolina Appellate Court Rules, who hereby designates the parts of the transcripts, Orders, pleadings, Affidavits, exhibits, and/or other materials which she proposes to include in the Record on Appeal.

PORTIONS OF THE TRANSCRIPT

1. July 23, 2014 Pages 28-29
2. September 18, 2014, Pages 51-52
3. November 25, 2014, Page 16

ORDERS

1. Order Dismissing Stanton
2. July 23, 2014 Form 4
3. Dismissal Order dated January 6, 2015

PLEADINGS

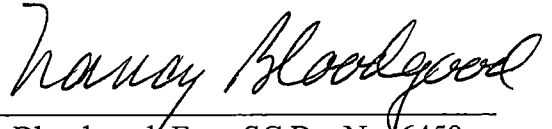
1. Complaint
2. Answer
3. Notice of Appeal

EXHIBITS AND OTHER MATERIALS

1. Plaintiff's Discovery Requests dated March 4, 2014
2. Defendant's Discovery Requests dated March 28, 2014
3. Letters extending deadlines
4. Plaintiff's June 13, 2014 Objection Letter
5. Defendants' June 11, 2014 Objection Letter

6. Letter dated June 20, 2014
7. Letter dated July 2, 2014
8. Plaintiff's Motion to Compel filed July 14, 2014
9. Defendants' Motion to Compel dated June 11, 2014
10. Plaintiff's Response to Defendants' Motion to Compel filed July 22, 2014
11. Letter dated August 5, 2014
12. Letter dated August 12, 2014
13. Supplemental Production dated August 12, 2014
14. Supplemental Production dated August 15, 2014
15. Supplemental Production dated August 19, 2014
16. Email dated November 4, 2014

I, Nancy Bloodgood, Esquire, hereby certify pursuant to Rule 209(c), SCACR, the Designation of Matters to be included in the Record on Appeal submitted by the Appellant does not contain any matter and/or items which are not relevant to this Appeal.



Nancy Bloodgood, Esq., SC Bar No. 6459

Lucy C. Sanders, Esq., SC Bar No. 78169

FOSTER LAW FIRM, L.L.C.

895 Island Park Drive, Suite 202

Charleston, SC 29492

Telephone: (843) 972-0313

Facsimile: (888) 519-0934

Email: nbloodgood@fosterfoster.com

lsanders@fosterfoster.com

Attorneys for the Appellant

Date: 6-11-15

Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Honorable Robert E. Hood, Circuit Court Judge

Case No. 2014-CP-40-00271

RECEIVED

JUN 17 2015

SC Court of Appeals

Kerry Paul,

Appellant,

v.

South Carolina Department of Employment and
Workforce,

Respondent.

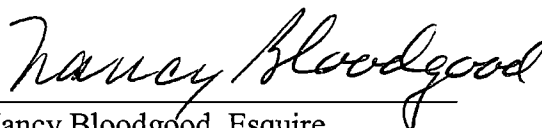
**PROOF OF SERVICE FOR APPELLANT'S BRIEF AND DESIGNATION OF
MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL**

Nancy Bloodgood, Esq., SC Bar No. 6459
Lucy C. Sanders, Esq., SC Bar No. 78169
FOSTER LAW FIRM, L.L.C.
895 Island Park Drive, Suite 202
Charleston, SC 29492
Telephone: (843) 972-0313
Facsimile: (888) 519-0934
Email: nbloodgood@fosterfoster.com
lsanders@fosterfoster.com
Attorneys for the Appellant

I hereby certify that on June 11, 2015 I served a copy of the Appellant's Brief and Designation of Matters to Be Included in the Record on Appeal via First Class Mail by placing a copy of the said documents in the United States mail with sufficient postage thereon on the following:

Christi P. Cox, Esquire
Hamilton Martens Ballou & Carroll
PO Box 10940
Rock Hill, SC 29731
Attorneys for the Respondent

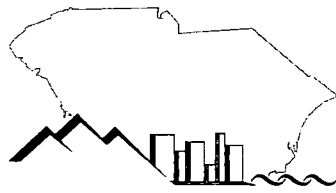
The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211



Nancy Bloodgood, Esquire

Charleston, South Carolina

Date: 6-11-15



FOSTER LAW FIRM, L.L.C.

Attorneys and Counselors at Law

NANCY BLOODGOOD
nbloodgood@fosterfoster.com
REPLY TO CHARLESTON

PAUL J. FOSTER, JR., 1928-1999

June 11, 2015

RECEIVED

JUN 17 2015

SC Court of Appeals

The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: *Kerry Paul v. South Carolina Department of Employment and Workforce*
Appellate Case: 2015-000244
Case No.: 2014-CP-40-271
Our File No.: 11463

Dear Ms. Kitchings,

Enclosed please find the original and one copy of the Initial Brief of Appellant and Designation of Matters in connection with the above-referenced matter. Please file the original and return a clocked-in copy of the same to me in the enclosed self-addressed stamped envelope.

By copy of this letter to opposing counsel, I am likewise providing her with a copy of the same.

Thank you for your assistance in this matter.

With kindest regards, I am

Sincerely,

Nancy Bloodgood

NB/alk

Enclosures

cc: Kerry Paul
Christi P. Cox, Esquire

www.fosterfoster.com

GREENVILLE: 601 E. McBee Avenue, Suite 104 • Greenville, SC 29601 • 864-242-6200 • Fax: 864-233-0290
CHARLESTON: 895 Island Park Drive, Suite 202 • Charleston, SC 29492 • 843-972-0313 • Fax: 888-519-0934

Toll Free: 866-279-9772

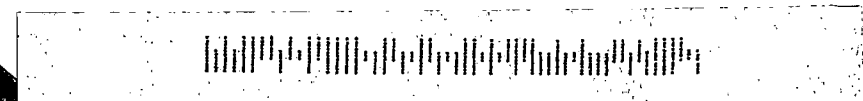
Foster Law Firm, LLC
895 Island Park Drive, Suite 202
Charleston, SC 29492

neopost[®]
06/11/2015
FIRST-CLASS
US POSTAGE \$02.24
FIRST-CLASS
ZIP 2949
041L10219

First Class Mail

RECEIVED
JUN 17 2015
SC Court of Appeals

The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211



First Class Mail

First Class Mail

Stock #R1470
Made in USA

Surviv
Quality Park Products

DuPont™ Tyvek®
Protect What's Inside.™

