

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge

Appellate Case No. 2014-002733

RECEIVED
JUN 29 2015
SC Court of Appeals

Samuel Washington, Jr., Respondent,

v.

South Carolina Electric and Gas Company; and
Emerson Electric Company d/b/a Emerson Network Power,
and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company Appellant.

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

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

1. S.C. OSHA Documents
2. Master Agreement between SCE&G and Emerson
3. Purchase Order Nos. FH-0100040103 and FH-0100040102
4. Purchase Order Number 4121009192
5. Emerson Subcontract Terms and Conditions For Installation and Construction Services for Purchase Order Number 4121009192
6. Attachment A to Emerson Subcontract Terms and Conditions For Installation and Construction Services for Purchase Order Number 4121009192
7. Transcript of September 4, 2014 Hearing.

June 29, 2015.



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ATTORNEYS FOR RESPONDENT

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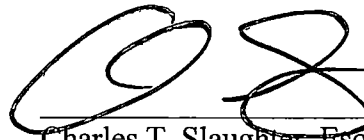
South Carolina Electric and Gas Company; and
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and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company Appellant.

CERTIFICATE OF COUNSEL

The undersigned certifies that the Designation of Matter to be Included in the Record on Appeal complies with Rule 209(c), SCACR and contains no matter which is irrelevant to the appeal.

June 29, 2015.



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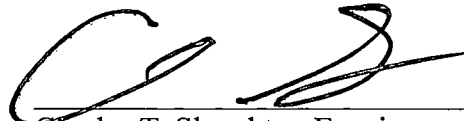
South Carolina Electric and Gas Company; and
Emerson Electric Company d/b/a Emerson Network Power,
and/or Emerson Network Power, Defendants,

Of Whom South Carolina Electric and Gas Company Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Designation of Matter to be Included in the Record on Appeal on Appellant South Carolina Electric and Gas Company by depositing a copy of it in the United States Mail, postage prepaid, on June 29, 2015, addressed to its attorneys of record, John A. Massalon and I. Ryan Neville, Wills Massalon & Allen, LLC, Post Office Box 859, Charleston, South Carolina 29402, and that the same was served on Defendant Emerson Electric Company d/b/a Emerson Network Power, and/or Emerson Network Power by depositing a copy of it in the United States Mail, postage prepaid, on June 29, 2015, addressed to its attorneys of record, H. Michael Bowers, Smith Moore Leatherwood, LLP, 25 Calhoun Street, Suite 250, Charleston, South Carolina 29401.

June 29, 2015.



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ATTORNEYS FOR RESPONDENT



Walker Morgan

ATTORNEYS AT LAW

William P. Walker, Jr. ♦ S. Kirkpatrick Morgan, Jr.*
Charles T. Slaughter+ ♦ William P. Walker, III

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JUN 29 2015

SC Court of Appeals

June 29, 2015

VIA HAND DELIVERY

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

Re: *Samuel Washington, Jr. v. South Carolina Electric and Gas Company,
Emerson Electric Company d/b/a Emerson Network Power and/or
Emerson Network Power*
Appellate Case No.: 2014-002733

Dear Ms. Kitchings:

Enclosed herewith please find an original and one (1) copy of the following documents relating to the above-referenced matter:

1. Initial Brief of Respondent;
2. Proof of Service of Respondent's Initial Brief;
3. Respondent's Designation of Matter to be Included in the Record on Appeal;
4. Proof of Service of Respondent's Designation of Matter to be Included in the Record on Appeal; and
5. Certificate of Counsel.

By copy of this letter, I am herewith serving copies of the foregoing upon all counsel of record. Thank you for your assistance with this matter and if you have any questions or need additional information, please do not hesitate to contact me.

With kindest personal regards, I am

Sincerely yours,

WALKER MORGAN, LLC

Charles T. Slaughter

CTS/

Enclosures: As Stated

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
June 29 , 2015
Page 2 of 2

cc: (*all via first class mail*)
 John A. Massalon, Esquire
 I. Ryan Neville, Esquire
 H. Michael Bowers, Esquire