

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

AUG 12 2015

APPEAL FROM RICHALND COUNTY
Court of Common Pleas

SC Court of Appeals

The Hon. Robert E. Hood, Circuit Court Judge

Appellate Case No.: 2015-000244

Kerry Paul,

Appellant,

v.

South Carolina Department of
Employment and Workforce,

Respondent.

Respondent's Designation of Matter for Record on Appeal

Pursuant to Rule 209 S.C.A.C.R., Respondent designates the following pleadings, orders, exhibits and other materials to be included in the Record on Appeal.

Transcripts

1. Complete Transcript of July 23, 2014 Hearing before the Honorable Robert E. Hood
2. Complete Transcript of September 8, 2014 Hearing before the Honorable Robert E. Hood
3. Complete Transcript of November 25, 2014 Hearing before the Honorable Robert E. Hood

Orders

4. October 23, 2014 Joint Stipulation of Dismissal of Cheryl Stanton, Issued by the Honorable Judge Robert E. Hood
5. January 6, 2015 Order of Dismissal, Issued by the Honorable Robert E. Hood and filed January 7, 2015

Pleadings

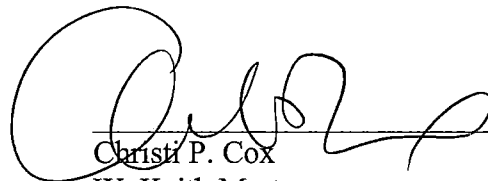
6. Complaint
7. Answer

8. Respondent SCDEW's Motion to Compel, filed July 17, 2014.
9. Respondent SCDEW's Memorandum of Law in Support of Sanctions, including all attachments (9 Tabs), filed September 8, 2014.
10. Respondent SCDEW's Amended Motion and Memorandum of Law in support of Sanctions, including all attachments (12 Tabs), filed November 6, 2014.
11. Appellant's Notice of Appeal

Exhibits and Other Materials

12. March 28, 2014, Defendants First Set of Interrogatories to Plaintiff;
13. March 28, 2014, Defendants First Set of Requests for Production to Plaintiff.
14. Appellant's Responses to Defendants' First Set of Interrogatories, May 30, 2014
15. Appellant's Response to Defendants' Motion to Compel, July 17, 2014
16. Appellant's Supplemental Responses to Interrogatories, August 5, 2014
17. August 6, 2014 Letter from Respondent's counsel to Appellant's counsel regarding deficiencies in Plaintiff's Supplemental Responses of August 5, 2014
18. August 12, 2014 Letter from Appellant's counsel supplementing information to Interrogatories regarding defamation
19. August 15, 2014 Letter from Appellant's counsel enclosing redacted cell phone records
20. August 21, 2014 Letter from Respondent's counsel regarding the redacted cell phone records
21. Affidavits of Thad H. Westbrook, Esq., Cheryl Stanton, Darrell T. Scott, Derrick McFarland, Debra Tedeschi, Maura Baker, Neil Adcox, Adam Twitty and Koa Morgan
22. June 11, 2014 Respondent's Motion to Compel
23. November 6, 2014 Amended Motion of Respondent
24. Supplemental Affidavit of John Faust;
25. November 10, 2014 Supplemental Affidavit of Derrick McFarland.

Counsel for Respondent certifies that this designation contains no matter which is not relevant to the appeal.



Christi P. Cox
W. Keith Martens
HAMILTON MARTENS BALLOU
& CARROLL, LLC
P.O. Box 10940
Rock Hill, SC 29730
(803) 329-7672
Attorneys for Respondent

August 19, 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHALND COUNTY
Court of Common Pleas

RECEIVED

The Hon. Robert E. Hood, Circuit Court Judge

AUG 12 2015

SC Court of Appeals

Case No.: 2014-CP-40-00271

Kerry Paul,

Appellant,

v.

South Carolina Department of
Employment and Workforce,

Respondent.

PROOF OF SERVICE

The undersigned certifies that she has served Respondent's Initial Brief And Designation of Matter on the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on August 10, 2015, addressed to its attorney of record, Nancy Bloodgood, 895 Island Park Drive, Suite 202, Charleston, SC 29492.

August 10, 2015


Christi P. Cox

W. Keith Martens

HAMILTON MARTENS BALLOU
& CARROLL, LLC

P.O. Box 10940

Rock Hill, SC 29730

(803) 329-7672

Attorneys for Respondent