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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal From York County
Court of Common Pleas
S. Jackson Kimball, Special Circuit Court Judge

Case No. 2012-CP-46-00146

Nadine Brantley Appellant,

v.

The City of Rock Hill, South Carolina,
a body politic and subdivision of the
State of South Carolina, and Wherry
Construction Co., Inc.,

Of which the City of Rock Hill is Respondent.

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

In addition to the matters designated by Appellant,
Respondent the City of Rock Hill ("Respondent") proposes the
following be included in the Record on Appeal.

1. Answer of City of Rock Hill dated February 17, 2012;
2. Plaintiff's Objections, Claims of Privilege, and Response to Interrogatories and Requests for Production of Documents by Defendant City of Rock Hill dated June 1, 2012;
3. City Responses to Plaintiff's Requests for Admissions dated October 10, 2012;

4. Transcript of 30(b)(6) Deposition of City of Rock Hill, August 15, 2013, pp. 54, 57;
5. City Supplemental Response to Interrogatory 8 (letter from counsel dated August 15, 2013);
6. Plaintiff's Supplemental Responses to Discovery dated November 1, 2013;
7. Transcript of Nadine Brantley Deposition (December 4, 2013) pp. 10, 12, 17-26, 29-30, 32-36, 43, 48, 52-53, 72, 85, 89;
8. Transcript of Ronald E. Wright Deposition (December 10, 2013), pp. 29-34, 40-52, 57-59, 66-71, 86, 90-94, Exhibit A;
9. Transcript of Robert Glenn Barfield Deposition (December 11, 2013), pp. 8-10, 12-13, 24, 29-37;
10. Notice and Motion for Summary Judgment entered March 31, 2014;
11. Affidavit of James G. Bagley, Jr. dated August 7, 2014;
12. City's Memorandum in Support of Motion for Summary Judgment dated August 8, 2014;
13. Order for Summary Judgment dated August 28, 2014 and entered September 2, 2014;
14. Order (denying motion to reconsider) dated December 15, 2014 and entered December 18, 2014.
15. Transcript of Proceedings dated August 11, 2014 (Hearing on City Motion for Summary Judgment/Plaintiff's Cross-Motion for Summary Judgment);
16. Transcript of Record dated October 16, 2014 (hearing on Plaintiff's Motion to Reconsider).

The undersigned certifies that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

September 9, 2015

By: W. Mark White

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ATTORNEYS FOR RESPONDENT

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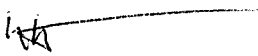
PROOF OF SERVICE

I certify that the foregoing Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal has been served by depositing copies thereof in the United States Mail, postage prepaid, on September 9, 2015, addressed to:

Nadine Brantley
9501 Greyson Ridge Drive
Charlotte, North Carolina 28277

SPENCER & SPENCER, P.A.

Date: September 9, 2015

By: 
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