

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Daniel B. Dorn, in his Capacity as the Parent and Natural Guardian of E.D., R.D., and Y.D., Appellant.

v.

Paul S. Cohen and Susan Cohen, individually and in their capacity as the Co-Conservators of the person of Abbie Ilene Dorn, a protected person and ward, and in their capacity as Co-Trustees of the Abbie Dorn Special Needs Trust, Respondents.

Paul S. Cohen, M.D. and Susan Cohen, Respondents,

v.

E.D., R.D. and Y.D., the Living Issue of Abbie Ilene Dorn and the South Carolina Department of Health and Human Services, Respondents below,

Of whom E.D., R.D. and Y.D., the Living Issue of Abbie Ilene Dorn are the Appellants,

and

The South Carolina Department of Health and Human Services is a Respondent.

In Re: The Abbie Dorn Special Needs trust.

Appellate Case No. 2015-000659

The Honorable Deadra L. Jefferson
Horry County
Trial Court Case No. 2013CP2608152, 2013CP2608139,
2014CP2601691, 2014CP2601744

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

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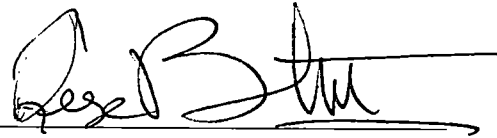
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SC Court of Appeals

In addition to the documents identified in the Appellant's Designation of Matters to be Included in the Record on Appeal, the Respondents' would further submit the following additional documents to be included in the Record on Appeal:

1. Abbie Ilene Dorn Answer to Amended Cohen Petition, May 4, 2011
2. Answer and Counterclaim of Dorn Children to Amended Cohen Petition, April 13, 2011
3. Cohen Answer to Dorn Children Counterclaim, May 16, 2011

Respectfully submitted,



Reese R. Boyd, III
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October 8, 2015

ATTORNEYS FOR RESPONDENTS
PAUL S. COHEN, M.D., AND SUSAN
COHEN, Individually and in their
Capacity as the Co-Conservators of the
Person of Abbie Ilene Dorn, a Protected
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CERTIFICATION OF COUNSEL

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Reese R. Boyd, III', written over a horizontal line.

October 8, 2015

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I certify that I have served Respondents' Initial Brief, Designation of Matters to be Included in the Record on Appeal and Certification of Counsel by depositing a copy of it in the United States Mail, postage prepaid, on October 8, 2015, addressed to:

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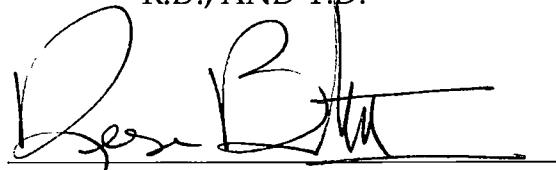
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and Ward, and in their Capacity as Co-Trustees
of the Abbie Dorn Special Needs Trust

BRET H. DAVIS, JD*, CPA

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SC Court of Appeals

The Honorable Jenny A. Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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In re: The Abbie Dorn Special Needs Trust

Appellate Case No.: 2015-00659

Our File Number: 010.033.c

Dear Clerk Kitchings:

The Honorable Jenny A. Kitchings
October 8, 2015
Page 2 of 2

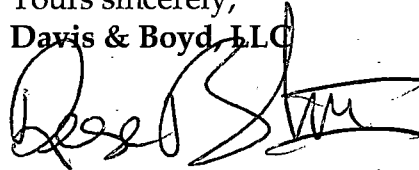
Enclosed please find the original and one (1) copy of Respondent's Initial Brief, Designation of Matters to be Included in the Record on Appeal, Certification of Counsel and Proof of Service in connection with the above referenced matter.

Please accept the originals for filing and return clocked copies to my office in the envelope provided.

Thank you for your assistance in this matter. If you have any questions or concerns, please feel free to contact me.

With kind regards, I remain,

Yours sincerely,
Davis & Boyd, LLC



Reese R. Boyd, III

*Attorney for Respondents Paul S. Cohen, M.D.
And Susan Cohen*

RRB/dke

Encl.

cc: John A. Massalon, Esq.
V. Lee Moore, Esq.
Lynette Rogers Hedgepath, Esq.
Shealy B. Reibold, Esq.
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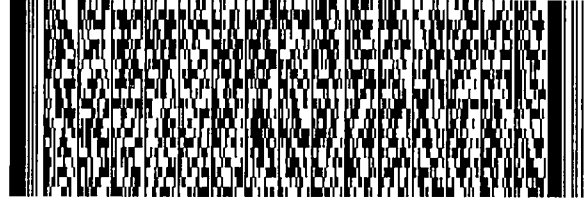
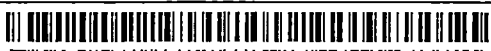
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SC Court of Appeals

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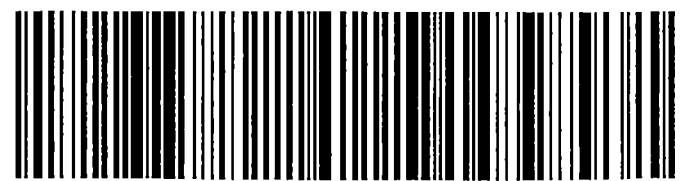


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