

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HAMPTON COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Circuit Court Judge

Case No.: 2014-001196

Lydia Cook, Respondent,

-v-

Regions Bank and Robyn Clevinger, Appellants.

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

Respondent designates the following items for inclusion in the Record on Appeal,
in addition to the materials designated by the Appellant.

- 1) Statement of Judgment in a Civil Case, filed May 5, 2014;
- 2) Order Denying JNOV, filed May 5, 2014;
- 3) Summons and Complaint filed August 26, 2011;
- 4) Amended Summons and Complaint, filed November 14, 2012;
- 5) Defendant's Answer to Complaint, filed November 7, 2011;
- 6) Defendant's Answer to Amended Complaint, filed December 20, 2012
- 7) Transcript of proceedings and testimony of the following witnesses:
 - a. Motion in Limine - pp. 53-56; 58-61;

- b. Opening Statement of John E. Parker – pp. 98-118;
- c. Opening Statement of Tiller & Griffith – pp. 118-133;
- d. Testimony of Glenn Welcker, M.D. – pp. 190-201;
- e. Testimony of Lydia Cook – pp. 209-218; 224-263; 307-313; 315; 320-322;
- f. Testimony of Robyn Celvinger – pp. 324-378; 386-388; 413-420;
- g. Testimony of Andrea Lloyd – pp. 423-435; 454-459;
- h. Motion – pp. 478-485;
- i. Testimony of Holly Johnson – pp. 487-542; 560-565; 667-671;
- j. Testimony of Michael Cook – pp. 566-576;
- k. Testimony of Elizabeth Priester – pp. 578-586;
- l. Directed Verdict Motion – pp. 599-621;
- m. Testimony of Patty Austin – pp. 620-625; 628-632;
- n. Testimony of Suzanne Freeman – pp. 675; 678; 682; 686-692;
- o. Directed Verdict Motion – pp. 702-711;
- p. Requests to Charge – pp. 724-728; 749-750; 755-756;
- q. Discussion about Stipulation – pp. 757-762;
- r. Closing Argument of John E. Parker – pp. 763-786;
- s. Closing Argument of John H. Tiller – pp. 787-806;
- t. Closing Argument of E. Mitchell Griffith – pp. 806-827;
- u. Rebuttal Argument of John E. Parker – pp. 828-831;
- v. Jury Charge – pp. 838-840;
- w. Jury Verdict – pp. 849-856

- 8) John Blackwell Video Deposition of December 18, 2013 – pp. 6-9; 11-13; 16-19;
- 9) Exhibits as follows:
 - a. Plaintiff's Trial Exhibits: Nos. 1, 2, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 22, 23, 25, 26, 27, 28, 29, 30, 31, 36, 37, 38, 42, 45, 46, 47, 49, 50, 52, 53, 54;
 - b. Defendants Exhibits: Nos. 1, 3, 4.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

PETERS, MURDAUGH, PARKER,
ELTZROTH & DETRICK, P.A.

November 16, 2015
Hampton, South Carolina

BY: Wil. Barnes
John E. Parker
William F. Barnes, III
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Post Office Box 457
Hampton, SC 29924
Phone: (803) 943-2111
ATTORNEYS FOR RESPONDENT

CERTIFICATE OF SERVICE

This is to certify that I, **Megan C. Davis**, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Respondent, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within **RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** to:

C. Mitchell Brown, Esquire
Michael J. Anzelmo, Esquire
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1320 Main Street / 17th Floor
Columbia, South Carolina 29201

John H. Tiller, Esquire
Amy F. Bower, Esquire
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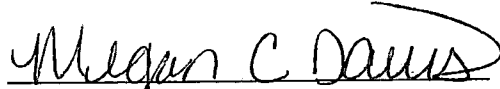
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-And-

E. Mitchell Griffith, Esquire
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ATTORNEYS FOR APPELLANTS,
REGIONS BANK AND ROBYN CLEVINGER

Re: Lydia Cook v. Regions Bank and Robyn Clevinger
Case No. 2011-CP-25-343
Appellate Case No.: 2014-001196


Megan C. Davis

November 16th, 2015
Hampton, South Carolina

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Regions Bank and Robyn Clevinger, Appellants.

PROOF OF SERVICE

This is to certify that I, *Megan C. Davis*, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within **RESPONDENT'S INITIAL BRIEF OF RESPONDENT and DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** to:

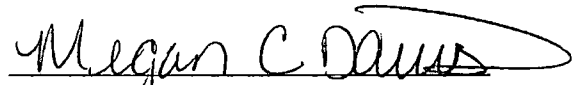
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November 16th, 2015
Hampton, South Carolina