

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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NOV 12 2015

APPEAL FROM CHARLESTON COUNTY
Court Of Common Pleas

SC Court of Appeals

The Honorable R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No: 2015-01328

Donna Douglass,.....Appellant,

v.

Berkshire on St. Ives, Berkshire Property Advisors, LLC, BVF North Cove LLC, and The
Berkshire Group,Respondents.

RESPONDENTS' DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondents propose the following to be included in the Record on Appeal.

Orders

1. Order Granting Respondents' Summary Judgment filed April 27, 2014
2. Order Denying Appellant's Motion for Reconsideration filed May 29, 2014

Motions

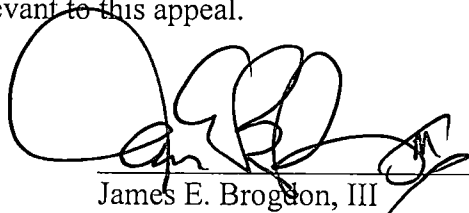
1. Respondents' Motion for Summary Judgment
2. Respondents' Memorandum in Support of Summary Judgment
3. Respondents' Memorandum in Opposition to Rule 59(e) Motion for Reconsideration
4. Appellant's Memorandum in Opposition of Summary Judgment
5. Appellant's Rule 59(e) Motion for Reconsideration

Transcripts

1. Transcript of April 8, 2015 Motion for Summary Judgment Hearing
2. Transcript of Donna Douglass' deposition
3. Transcript of Greg Moran's deposition

Pursuant to Rule 209(c), SCACR, counsel for Respondents certify that this Designation contains no matter that is irrelevant to this appeal.

November 12, 2015



James E. Brogdon, III
Jessica A. Waller
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ATTORNEYS FOR RESPONDENTS

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Berkshire on St. Ives, Berkshire Property Advisors, LLC, BVF North Cove LLC, and The
Berkshire Group, Respondents.

PROOF OF SERVICE

I certify that on November 12, 2015, I served a copy of Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal by United States Mail, postage prepaid to the following:

Jarrel L. Wigger, Esq.
WIGGER LAW FIRM, INC.
8086 Rivers Ave, Suite A
North Charleston, SC 29406

November 12, 2015

A handwritten signature in black ink, appearing to read 'James E. Brogdon, III', written over a horizontal line.

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VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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SC Court of Appeals

RE: Donna Douglass v. Berkshires on St. Ives, Berkshire Property Advisors, LLC, BVF
North Cove LLC and The Berkshire Group
Civil Action No.: 2013-CP-10-7133
GWB No.: 8356-3

Dear Ms. Kitchings:

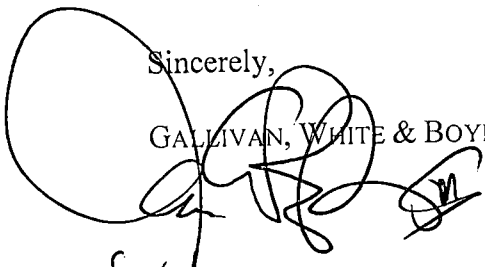
Please find enclosed the original and two copies of Respondents' Initial Brief, Designation of Matter and Certificate of Compliance. Please file these documents and return filed copies to this office via our courier.

By copy of this letter, as evidenced on the attached Proof of Service, I am serving opposing counsel with the same.

With kind regards, I am

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.


Jessica A. Waller

JAW/ct

Enclosures

cc: Jarrel L. Wigger, Esq.