

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

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Case No. 2013-CP-30-3513

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RECEIVED  
NOV 09 2015  
SC Court of Appeals

Kathleen Lollis and Linda Campbell .....Appellants/Respondents,

vs.

Lisa Dutton, Dennis Dutton, and Kelsey Dutton.....Respondents/Appellants,

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DESIGNATION OF MATTER  
TO BE INCLUDED IN  
THE RECORD ON APPEAL

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The Appellants/Respondents propose the following be included on the Record on Appeal:

- 1) Amended Complaint;
- 2) Answer and Counterclaim;
- 3) Contract dated November 21, 2011;
- 4) Contract dated December 20, 2012;
- 5) Appellants' Motion to Reconsider dated July 13, 2015;
- 6) Transcript of Record from trial on March 16, 17, 18, and 19, 2015;
- 7) Final Order dated July 6, 2015;
- 8) Order filed on March 14, 2014;
- 9) Copies of checks (Defendants' Exhibit 31);
- 10) Receipt for \$35,000 cash payment;
- 11) Receipt for \$1,400 cash payment;
- 12) Deed recorded 06-15-99;
- 13) Receipt for \$24,700 cash payment;

- 14) Final Report of Marvin H. Dawson, Jr.;
- 15) Copy of check to Frank Lollis for \$150 from the account of Respondent Dennis Dutton;
- 16) Facebook post of Respondent Lisa Dutton dated February 3, 2012;
- 17) Facebook post from Respondent Lisa Dutton dated August 21, 2012;
- 18) Facebook post from Respondent Lisa Dutton dated October 12, 2012;
- 19) Letters from Social Security Administration dated April 16, 2006;
- 20) Defendants' Exhibit 12- Deeds: B882, P89; B893, P9; B894, P52; B897, P272; B898 P208; B901, P139; B923, P273; B942, P145; B943, P183; B947, P219; B984, P205; B992, P287; B1054, P269; B1057, P1; B1059, P93; B1081, P87; B1096, P183
- 21) Defendants' Exhibit 74 – signatures of Kathleen Lollis from the public record;
- 22) Defendants' Exhibit 3 – Deed filed on May 16, 2002;
- 23) Defendants' Exhibit 4 – Deed filed on September 23, 2010;
- 24) Defendants' Exhibit 14 – Deed filed on August 23, 1984;
- 25) Defendants' Exhibit 42 – List of Frank Harvey Lollis property at the time of his death;
- 26) Defendants' Exhibit 72 – Bill of Sale dated February 1, 2012;
- 27) Plaintiffs' Exhibit 11 – Affidavit of Lisa Dutton dated July 17, 2013.

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

November 5, 2015

Respectfully submitted,

By: 

Matthew P. Turner and  
Turner & Burney, P.C.  
Post Office Box 668  
Laurens, South Carolina 29360  
(864) 984-6565  
Attorney for Appellants

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**PROOF OF DELIVERY**

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I hereby certify that I have served one (1) copies of the Appellants/Respondents Initial Brief and Designation of Matter on the below named, by depositing a copy of the same in the United States Mail, on the 6 day of November, 2015, with sufficient postage annexed thereto, addressed thereto and mailed to the same at the address below:

John R. Ferguson, Esquire  
Post Office Box 286  
Laurens, South Carolina 29360

November 6, 2015

TURNER & BURNEY, P.C.



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