

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM DARLINGTON COUNTY  
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

Case No. 2015-001907

**RECEIVED**

DEC 15 2015

SC Court of Appeals

Haley Jefferson, as Personal Representative of the Estate of Michael Jefferson,

Appellant

v.

Landmark Inn 786 Hospitality, LLC,

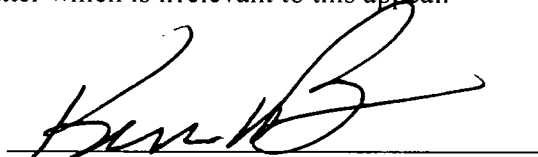
Respondent

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

Appellant proposes the following be included in the Record on Appeal:

1. Summons and Complaint
2. Answer
3. Respondent's Notice of Motion and Motion for Summary Judgment
4. Affidavit of William F. Booth dated January 20, 2015
5. Appellant's Memorandum in Opposition to Motion for Summary Judgment
6. Order of Honorable Larry B. Hyman, Jr., filed July 8, 2015 (granting Respondent's Motion for Summary Judgment)
7. Appellant's Motion for Reconsideration and Motion to Alter or Amend
8. Respondent's Memorandum in Opposition to Appellant's Motion for Reconsideration and Motion to Alter or Amend
9. Form 4 Order of Honorable Larry B. Hyman, Jr. (denying Motion for Reconsideration)
10. SLED Toxicology Report for Decedent
11. SLED GSR Report for Decedent
12. Summary of Criminal Activity at Respondent's Motel during the time Respondent managed Motel
13. Incident Reports from Landmark Inn from 2007 through 2009 (date of incident)
14. Deposition of Harriet Gupton
15. Deposition of Jaffar Hussain
16. Deposition of Brian Rudick

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

A handwritten signature in black ink, appearing to read "Kevin M. Barth", is written over a horizontal line.

Kevin M. Barth  
Barth, Ballenger & Lewis, LLP  
P.O. Box 107  
Florence, South Carolina 29503  
(843) 662-6301  
ATTORNEY FOR APPELLANT

December 14, 2015

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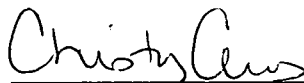
Respondent

CERTIFICATE OF SERVICE

I, the undersigned, of the law offices of Barth, Ballenger, & Lewis, LLP, do hereby certify that I have served all counsel in this action with a copy of the foregoing pleading by causing a copy of the same to be mailed by United States mail, postage prepaid, to the following address(es):

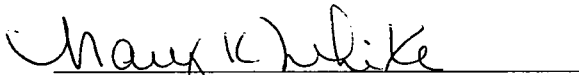
PLEADING: Initial Brief of Appellant and Appellant's Designation of Matter to Be Included in the Record on Appeal

COUNSEL SERVED: Steven J. Pugh Carmen V. Ganjehsani  
P.O. Drawer 7788 P.O. Drawer 7788  
Columbia, SC 29202 Columbia, SC 29202



CHRISTY GRAVES  
POST OFFICE BOX 107  
FLORENCE, SOUTH CAROLINA 29503  
(843) 662-6301

Sworn to and subscribed before me  
this 14<sup>th</sup> day of December, 2015



Notary in and for South Carolina  
My Commission Expires: 08/31/2020