

3

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Maite' Murphy, Circuit Court Judge

RECEIVED

DEC 30 2015

Appellate Case No.: 2015-001718  
Circuit Court Case No.: 2010-CP-38-0670

SC Court of Appeals

Wanda Mack, ..... Appellant,

v.

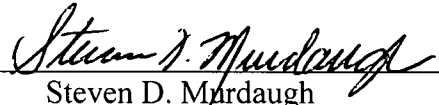
Carmen Gates, ..... Respondent.

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

In addition to any matters previously designated by the Appellant or the Respondent, Appellant Wanda Mack proposes the following to be included in the Record on Appeal:

- A. Plaintiff's Complaint
- B. Defendant's Answer
- C. Letter from Attorney Wlodarczk dated Oct. 21, 2010
- D. Letter from J. Reaves McLeod dated Jul. 27, 2011
- E. Email from James B. Lybrand
- F. Letter from Heidi Britton dated Sept. 29, 2011
- G. Letter from James B. Lybrand dated Oct. 6, 2011
- H. Order of Hon. Edgar W. Dickson signed Oct. 23, 2011, filed Oct. 28, 2011
- I. Transcript of Record
- J. Plaintiff's Motion to Reconsider and to Alter or Amend
- K. Affidavit of Steven D. Murdaugh

- L. Letter from Attorney Murdaugh dated Jan. 26, 2012 enclosing discovery
- M. Letter from James B. Lybrand dated Feb. 26, 2013
- N. Plaintiff's Motion to Restore Pursuant to Rule 40(j)
- O. Order of Hon. Maite' Murphy signed Nov. 25, 2014
- P. Form 4 Order of Hon. Maite' Murphy signed June 8, 2015

By:   
Steven D. Murdaugh  
R. Alexander Murdaugh  
PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.  
Post Office Box 1164  
Walterboro, SC 29936  
Phone: 843-549-9544  
Fax: 843-549-9546

ATTORNEYS FOR APPELLANT

Walterboro, South Carolina  
December 29, 2015

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

---

**APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas**

**Maite' Murphy, Circuit Court Judge**

---

**RECEIVED**

DEC 30 2015

**Appellate Case No.: 2015-001718  
Circuit Court Case No.: 2010-CP-38-0670**

---

**SC Court of Appeals**

**Wanda Mack, .....Appellant,**

**v.**

**Carmen Gates, ..... Respondent.**

---

**PROOF OF SERVICE**

---

I hereby certify that I have served the Initial Brief of Appellant Wanda Mack and Appellant's Designation of Matter to be Included in the Record on Appeal by affixing same with proper postage and placing the same with the United States Postal Service on the 29<sup>th</sup> day of December, 2015 addressed to the following:

James B. Lybrand, Jr.  
McDonald, McKenzie, Rubin, Miller and Lybrand, LLP  
1704 Main Street 2<sup>nd</sup> Floor  
Post Office Box 58  
Columbia, South Carolina 29202  
(803) 252-0500

By: Steven D. Murdaugh  
Steven D. Murdaugh  
R. Alexander Murdaugh  
PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.  
Post Office Box 1164  
Walterboro, SC 29936  
Phone: 843-549-9544  
Fax: 843-549-9546

ATTORNEYS FOR APPELLANT

Walterboro, South Carolina  
December 29, 2015

LAW OFFICES  
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK

PROFESSIONAL ASSOCIATION

123 WALTER STREET  
POST OFFICE BOX 1164

WALTERBORO, SOUTH CAROLINA 29488

TELEPHONE: (843) 549-9544

TOLL FREE: (800) 943-2113

FAX: (843) 549-9546

WWW.PMPED.COM

JOHN E. PARKER  
J. PAUL DETRICK  
DANIEL E. HENDERSON  
MARK D. BALL  
RANDOLPH MURDAUGH, IV  
R. ALEXANDER MURDAUGH  
BERT G. UTSEY, III  
RANDOLPH MURDAUGH, III  
GRAHAME E. HOLMES  
LEE D. COPE  
LEAGUE B. CREECH  
STEVEN D. MURDAUGH  
WILLIAM F. BARNES, III  
AUSTIN HOWELL CROSBY  
RONNIE L. CROSBY  
MATTHEW V. CREECH

CLYDE A. ELTZROTH, JR.  
(INACTIVE)

RANDOLPH MURDAUGH, SR.  
(1887-1940)  
RANDOLPH MURDAUGH, JR.  
(1915-1995)  
J. ROBERT PETERS, JR.  
(1927-2008)

OTHER OFFICES:  
101 MULBERRY STREET EAST  
POST OFFICE BOX 457  
HAMPTON, SC 29924  
TELEPHONE (803) 943-2111  
FAX (803) 943-3943

690 NORTH GREEN STREET  
POST OFFICE BOX 2500  
RIDGELAND, SC 29936-2500  
TELEPHONE: (843) 726-6131  
FAX: (843) 726-6057

December 29, 2015

Email: [smurdaugh@pmped.com](mailto:smurdaugh@pmped.com)

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

RE: Wanda A. Mackv. Carmen Gates  
C/A No: 2015-CP-10-3488

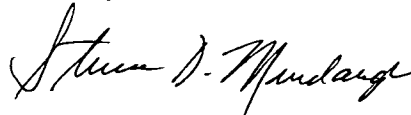
Dear Ms. Kitchings:

Enclosed herewith please find Appellants Motion for Extension of Time to File Initial Brief and Designation of Matter and Proof of Service, Appellants Initial Brief, Appellants Designation of Matter to be Included in the Record on Appeal and Proof of Service with regard to the above referenced matter. I would appreciate your filing the same and returning a clocked copy to me in the enclosed self-addresses, stamped envelope provided for your convenience. By copy of this correspondence, I am serving opposing counsel with a copy of the same.

Should you have any questions or concerns regarding the enclosed, please do not hesitate to contact me.

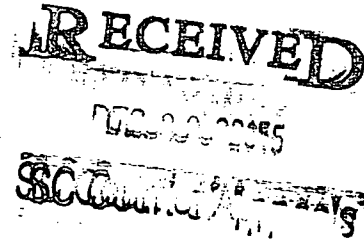
With kind regards, I am

Sincerely,



Steven D. Murdaugh

SDM/cb  
Enclosures



RECEIVED

DEC 30 2015

SC Court of Appeals

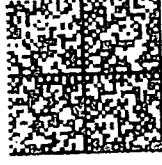
**First Class**

LAW OFFICES

**PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK**

PROFESSIONAL ASSOCIATION  
123 SOUTH WALTER STREET  
POST OFFICE BOX 1164

WALTERBORO, SOUTH CAROLINA 29488



02 1P  
0000604672 DEC 29 2015  
MAILED FROM ZIP CODE 29488

**RECEIVED**

Honorable Jenny Abbott Kitchings  
South Carolina Court Of Appeals  
1220 Senate Street  
Columbia, SC 29201

DEC 30 2015

SC Court of Appeals