

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
APPEAL FROM SUMTER COUNTY  
COURT OF COMMON PLEAS  
George C. James, Circuit Court Judge

RECEIVED  
JAN 12 2016  
SC Court of Appeals

Appellate Case No: 2015-002481

Charles Taylor,.....Appellant

v.

Stop "N" Save, Inc., d/b/a  
El Cheapo Plus #7 and Roy Rahal,.....Respondent

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

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

**1<sup>st</sup>: Orders/Judgments-Appealed From**

1. Judge James' Email Notice 11/11/15 of Order in Case (2 p.)
2. Judge James' Order 11/20/15 Judgment (19 p.)

**2<sup>nd</sup>: Pleadings/Transcripts**

3. Appellant's 6/9/14 Amended Complaint (29 p) (Just as filed in the lower court & all p's hereinafter)
4. Respondents' 7/14/14 Amended Answer (8 p)
5. Respondent's 5/12/15 Motion for Summary Judgment (2 p)

6. Appellant's 5/26/15 Notice to Court re Obtaining Copy Reginald Morton's Deposition (3 p)
7. Appellant's 8/14/15 Notice to Court re the 7-8-15 Scheduling Order (5 p)
8. Appellant's 10/14/15 Hearing Memorandum List all Pleadings in court file re Summary Motions (3 p)
9. Appellant's 9/18/15 2nd Amendment to Motion for rule 11 & sc. sec. 15-36-10 sanctions (1 p)
10. Appellant's Motion for Leave to Amend Pleadings per SCRCP 15b-c (6 p)
11. Deposition Transcript Excerpts from Defendant Roy Rahal's June 2, 2015 Deposition (74 p)  
page #: 11, 12, 13, 16, 18, 20, 21, 23, 25, 26, 34, 35, 36, 37, 38, 39, 42, 44, 50, 51, 52, 55, 56, 57, 60, 64, 65, 68, 69, 73, 74, 75, 77, 78, 82, 85, 99, 100, 101, 102, 104, 105, 108, 109, 110, 127, 136, 140, 141, 142, 143, 151, 158, 159, 171, 177, 181, 182, 185 and 192.
12. Deposition Transcript Excerpts from Defendants' witness Reginald Morton Deposition (1 p)  
page #: 27
13. Hearing Transcript Excerpts from Dispositive-Summary 10-14-15 Judgment Hearing of (19 p)  
page #: 6, 23, 24, 38, 39, 44, 45, 46, 47, 48, 54, 55, 56, 57, 101, 124, 140, 142, 143.
14. Defendants' Interrogatories Answers, with, their Counsels' Signature pages (27 Total Pages)

3<sup>rd</sup>: Affidavits

15. Appellant's Rosa McBride's 8/27/14 Affidavit re Odell Morton Whereabouts Morning 6/1/13 (1 p)
16. Appellant's 10/26/15 Affidavit re Reginald Morton's 4/24/15 Baltimore Maryland Deposition (8 p)
17. Appellant's 10/26/15 Affidavit re Defendants' 10-14-15 Memorandums (2 p)
18. Defendant's 10/9/15 Winkelman Affidavit re Appellant's rule 15(b-c) Motion to Amend (3 p)
19. Appellant's 6/15/15 Affidavit re the IIED Damages, et al., etc. (4 p)
20. Appellant's Mary Mitchell's 7/15/15 Affidavit re Reginald Morton's 6-1-13 IIED conduct (1 p)
21. Appellant's 9/21/15 Affidavit re Reginald Morton's resulting Damage to House 6/1/13 (1 p.)
22. Appellant's 9/25/14 Affidavit re Reginald Morton's resulting Damage to House from 6/1/13 (1 p)
23. Appellant's 9/11/15 Affidavit re Reginald Morton's resulting Damage to House from 6/1/13 (1 p)
24. Appellant's 9/18/15 Affidavit re House Total Ruin Loss Valuation (3 p)

25. Appellant's 9/21/15 Affidavit re House Rental Income Loss From 6/1/13 to 10/1/15 and on (1 p)
26. Appellant's 7/8/15 Affidavit re Reginald Morton's Initial IIED Conduct on 6/1/13 (1 p)
27. Appellant's 7/30/15 Affidavit re the IIED induced Anemic Diagnosis Conditions (2 p)
28. Appellant's Mary Mitchell's 9/8/15 Affidavit re Reginald Morton's Conduct 6/1/13 (1 p)
29. Appellant's 5/28/14 Affidavit re Odell Morton Never spoke in this case from 6/1/13 (1 p)
30. Appellant's 2/9/15 Affidavit re Odell Morton valid license when apply to move in 5/1/12 (2 p)

*4<sup>th</sup>: Exhibits /&/or all other Documents*

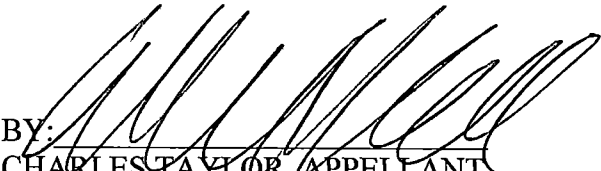
31. Maryland DMV driving record of an Odell Morton (1 p)
32. Odell Morton commode-walker roller-walker seat-invoice (1 p)
33. Odell Morton's Hove-Round Wheel Chair document (1)
34. Respondents' notice of taking O. & R. Morton's Deposition (1)
35. Defense 3/20/15 letter--we don't represent O. & R. Morton (1 p)
36. Magistrate's 5/23/13 eviction filing w/Odell Morton' signature on it (1 p)
37. The forge-sign 3 U-Haul truck rental documents by Reginald Morton (3 p)
38. RepWest's letter to Reginald Morton re his reporting damages claim (1 p)
39. Sumter Bail Bondsman & Sheriff Office looking for Reginald Morton sheet (1 p)
40. SC law sheet-residents 90 days to turn in out of state license and get SC dr. license (1 p)
41. Appellant's 1st 10/8/14 Notice to Defendants re continuing IIED effects w/photos. (6 p)
42. Appellant's 2nd 11/12/14 Notice to Defendants re continuing IIED effects w/ photos. (4 p)
43. Appellant's 3rd 5/29/15 Notice to Defendants re worsening IIED effects w/ documents. (5 p)
44. Appellant's 4th 6/1/15 Notice to Defendants re worsening IIED effects w/ medical bills. (5 p)
45. Appellant's 5th 6/17/15 Notice to Defendant's re worsening IIED effects & with photos. (9 p)
46. Appellant's additional IIED Tumor Surgery photos (3 p)

- 47. Document-Judge Curtis gave Reginald Morton bond for another crime shortly before 6/1/13 (1 p)
- 48. Appellant's 6/22/15 letter to Defense Counsels re red flags re Roy Rahal & Zaher Mohammad (2 p)
- 49. Brogdon 3/30/15 letter to Morton w/ false address & return Appellants letter from same address (2 p)
- 50. Appellant's 6-8-15 letter as required under 15-36-10 to Defendants-defense 1<sup>st</sup>-but never a reply (1 p)
- 51. 2 other forge-sign Odell Morton signatures by someone on 2 other u-haul truck rental documents.(2 p)
- 52. Letter 1/8/14 Kuppens & Smith quit the Defense and substituted by Culbreath & Brogdon et al. (1 p)

**Total Pages**

**285**

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

BY:   
CHARLES TAYLOR, APPELLANT  
332 MYRTLE BEACH HIGHWAY  
SUMTER, SOUTH CAROLINA 29153  
(803) 609-7990  
FOR THE APPELLANT, PRO SE

Sumter, South Carolina

January 11, 2016

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS  
APPEAL FROM SUMTER COUNTY  
COURT OF COMMON PLEAS

George C. James, Circuit Court Judge

Appellate Case No: 2015-002481

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SC Court of Appeals

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El Cheapo Plus #7 and Roy Rahal,.....Respondents

PROOF OF SERVICE:

I certify that I have served--filed the Appellant's Designation of Matter by depositing a copy of same in the U.S. Mail postage prepaid, on the date of Jan. 11, 2016, from Sumter South Carolina address to Defendants' lead Counsel of Record listed below, at his address listed below, and same copied to the clerk of this court with return copy to Appellant..

January 11, 2016

BY:   
CHARLES TAYLOR, APPELLANT  
332 MYRTLE BEACH HIGHWAY  
SUMTER SOUTH CAROLINA 29153  
(803) 609-7990

Defendants' Counsels of Record  
Lead-Gray T. Culbreath, Esq.  
James E. Brogdon, Esq., of  
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Julia L. Fenwick, Esq., of  
Bryan Cave, LLP.  
1 Atlantic Center, 4th Fl.  
1201 W. Peachtree St., NW.  
Atlanta, Georgia. 30309  
(404) 572-6923

January 11, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina  
Court of Appeals  
1015 Sumter Street  
Columbia, S.C. 29201

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SC Court of Appeals

RE: Charles Taylor, Appellant

vs.

Stop "N" Save, Inc., d/b/a, El Cheapo Plus #7 and Roy Rahal, Respondents

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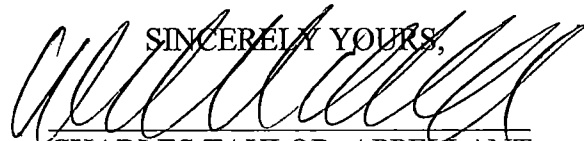
Dear Mrs. Kitchings:

Please find enclosed for filing the following:

- (1). Appellant's Initial Brief with Certificate of Service and;
- (2). Appellant's Designation of Matter with Certificate of Service.

The Defendants' lead counsel below is served the same at the address shown below.  
Please clock and return the extra copy to me in the self-addressed stamped envelope.

SINCERELY YOURS,



CHARLES TAYLOR, APPELLANT  
332 MYRTLE BEACH HIGHWAY  
SUMTER SOUTH CAROLINA 29153  
(803) 609-7990

Cc: Defendants' Counsels of Record

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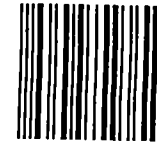
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Charles Taylor  
332 Myrtle Bch Hwy  
Sumter SC 29153

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JAN 12 2016

SC Court of Appeals



Clerk of Court  
SC Court of Appeals  
1015 Sumter Street  
Columbia SC 29201

**LEGAL DOCUMENTS**  
**HANDLE W/CARE!**

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