

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Judge

Appellate Case No. 2015-000778
Case No. 2013-CP-23-01762

RECEIVED
DEC 29 2015
SC Court of Appeals

Carol Simpson,

Appellant,

v.

Frank A. Landgraff, Carol Sutton, Sutton & Associates
Investigations, Inc., Defendants,


Of Whom Frank A. Landgraff is the

Respondent.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal. I certify that this designation contains no matter which is irrelevant to this appeal.

December 23, 2015


William G. Mayer
118 West Main Street
Laurens, SC 29360
864-984-9202 Telephone
864-715-0496 Facsimile
Attorney for the Appellant

1. Complaint under Pseudonym
2. Amended Complaint to Further Identify Defendants
3. Amended Complaint to Amend Caption
4. Amended Complaint to Identify Plaintiff
5. Answer of Frank A. Landgraff
6. Amended Answer of Frank A. Landgraff
7. Answer of Carol Sutton & Carol Sutton & Associates - Investigations, Inc.
8. Amended Answer of Carol Sutton & Carol Sutton & Associates - Investigations, Inc.
9. Plaintiff's Motion to Proceed Under Pseudonym
10. Affidavits of William G. Mayer
11. Plaintiff's Motion for Temporary Restraining Order
12. Order Granting Plaintiff Right to Proceed Anonymously
13. Order Denying Plaintiff's Motion for Temporary Restraining Order
14. Order Regarding Plaintiff's Right to Proceed Anonymously
15. Motion to Strike and for Partial Summary Judgment
16. Memorandum in Opposition to Defendant's Motion
17. Order Granting Defendant's Motion to Set Aside
18. Plaintiff's Motion to Amend Order
19. Memorandum Support Plaintiff's Motion to Set Aside
20. Form 4 Denying Plaintiff's Motion to Alter Amend Order
21. Memorandum in Support Plaintiff's Motion to Strike
22. Rule 56(f) Affidavit
23. Form 4 Denying Motion to Strike and Partial Summary Judgment
24. Motion to Compel
 - a. Exhibit 1 – Copies of Frank A. Landgraff's Discovery Requests
 - b. Exhibit 2
 1. Plaintiff's Response to Frank A. Landgraff's First Interrogatories
 2. Plaintiff's Response to Frank A. Landgraff's First Requests for Admission
 3. Plaintiff's Response to Frank A. Landgraff's First Requests for Production
25. Plaintiff's Second Motion to Strike
26. Plaintiff's Answer Motion to Compel
27. Memorandum in Support of Plaintiff's Motion to Strike
28. Defendant's Motion for Summary Judgment
29. Plaintiff's Memorandum in Opposition to Motion for Summary Judgment with Exhibits
 - a. Affidavits from Family Court Case 2010-DR-1359
 - b. Certified Criminal Records Search
30. Plaintiff's Supplemental Response to Frank A. Landgraff's First Interrogatories
31. Plaintiff's Supplemental Response to Frank A. Landgraff's Requests for Production
32. Plaintiff's First Set of Interrogatories to Carol Sutton & Carol Sutton & Associates - Investigations, Inc.
33. Plaintiff's First Requests for Admissions to Carol Sutton & Carol Sutton & Associates - Investigations, Inc.

34. Plaintiff's First Requests for Production to Carol Sutton & Carol Sutton & Associates - Investigations, Inc. with Exhibits
 - a. Exhibit A
 1. Settlement Terms Sheet – Family Court Case 2010-DR-1359 and Exhibit A thereto consisting of a letter from Frank Landgraff
 2. Plaintiff's Motion to Seal File – Family Court Case 2010-DR-1359
 3. Supplemental Order Sealing File – Family Court Case 2010-DR-1359
 4. Amended Complaint – Common Pleas Case 2010-CP-23-6024
 - b. Exhibit B – Calendar
 - c. Exhibit C
 1. Criminal Background Check
 2. Award Letter from State Office of Victim Assistance
 3. Incident Report from Greenville County Sheriff's Department
 4. Invoices from therapists
 - d. Exhibit D – Numerous affidavits
35. Defendant's Supplemental Memorandum Supporting Summary Judgment
36. Form 4 Granting Summary Judgment
37. Plaintiff's Memorandum in Opposition to the Defendant's Proposed Order
38. Order Granting Summary Judgment
39. Plaintiff's Motion for Reconsideration
40. Amended Order Granting Summary Judgment to Defendant Landgraff
41. All attachments and exhibits to the above documents
42. All orders of the Court in this Action
43. Transcript of Record of Hearing on November 17, 2014

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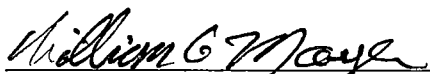
Of Whom Frank A. Landgraff is the

Respondent.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that hereby certify that I have served a copy of Designation of Matter to be Included in the Record on Appeal upon the individuals named below, by placing a copy in the United States Mail, postage prepaid and return address clearly indicated to the addresses below on this 23rd day of December, 2015:

Attorneys for Frank A. Landgraff -- Lane Davis, Timothy E. Madden, Reid T. Sherard
Nelson Mullins Riley & Scarborough, LLP
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