

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Case No. 2010-CP-33-931

Celeste Hemmingway, as Personal Representative
of the Estate of Ronnie Earl Davis; and David
Brown.....Appellants,

v.

Marion County and Marion County Prison
Camp.....Respondents.

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

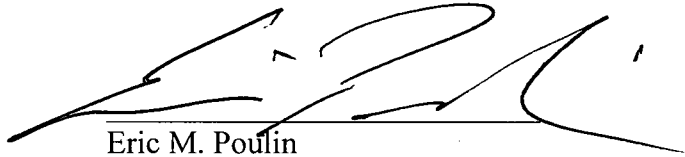
Appellants propose the following be included in the Record on Appeal:

1. Amended Complaint filed February 27, 2012
2. Deposition of David Brown
3. Deposition of John Reichardt
4. Defendants' Motion for Summary Judgment and Memorandum in Support
5. Plaintiffs' Memorandum in Opposition to Summary Judgment
7. Transcript of Hearing on June 15, 2012
9. Order Granting Summary Judgment
10. Order Of Stay by Workers' Compensation Commission

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

[signature on following page]

September 5, 2012

A handwritten signature in black ink, appearing to read 'E. Poulin', written over a horizontal line.

Eric M. Poulin
S.C. Bar No.: 100209
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2850 Ashley Phosphate Rd., Suite B
North Charleston, SC 29418
(843) 614-8888

Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

William H. Seals, Circuit Court Judge

Case No. 2010-CP-33-941

Celeste Hemmingway, as Personal Representative
of the Estate of Ronnie Earl Davis; and David
Brown.....Appellants,

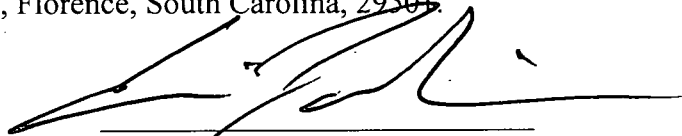
v.

Marion County and Marion County Prison
Camp..... Respondents.

PROOF OF SERVICE

I certify that I have served Appellants' Initial Brief and Designation of Matter on Marion County and Marion County Prison Camp by depositing a copy of it in the United States Mail, postage prepaid, on September 5, 2012, addressed to their attorney of record, D. Malloy McEachin, 2117 W. Palmetto Street, Suite C, Florence, South Carolina, 29501.

September 5, 2012



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Reply to the North Charleston Office

September 5, 2012

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

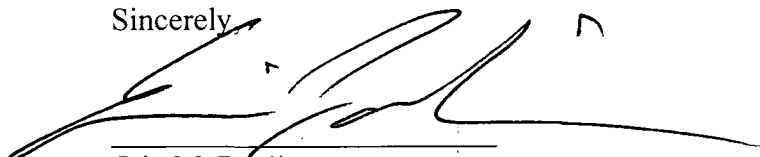
RE: *Celeste Hemmingway, as PR of the Estate of Ronnie Earl Davis, and David Brown v. Marion County*
Case No.: 2010-CP-33-941
Court Tracking No.: 2012-212621

Dear Ms. Kitchings:

Enclosed for filing please find the Original and one copy of Appellant's Initial Brief in this matter as well as the Original and one copy of Appellants' Designation of Matter to be included in the Record on Appeal. Also enclosed is the original and one copy of proof of service of the same on the Respondents.

We would appreciate it if you would file the originals and return the copies in the enclosed envelope.

Sincerely,



Eric M. Poulin

S.C. Bar No.: 100209

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Cc: Celeste Hemmingway

Cc: David Brown

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SC Court of Appeals

ADDITIONAL OFFICES

Florence, South Carolina * Greenville, South Carolina * Columbia, South Carolina
Wilmington, North Carolina