

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SUMTER COUNTY  
Court Of Common Pleas

FEB 10 2016

The Honorable George C. James, Jr., Judicial Circuit Court Judge  
Case No.: 2012-CP-08-1801

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. ....Respondents.

RESPONDENTS' DESIGNATION OF MATTERS TO BE INCLUDED IN THE  
RECORD ON APPEAL

Gray T. Culbreath  
James. E. Brogdon, III  
Jessica A. Waller  
GALLIVAN, WHITE & BOYD, P.A.  
1201 Main Street, Suite 1200  
Post Office Box 7368(29202)  
Columbia, South Carolina 29201  
(803) 779-1833  
(803) 779-1767 (f)

Randy J. Soriano (*pro hac vice*)  
Julia Fenwick Ost (*pro hac vice*)  
Bryan Cave, LLP  
211 N. Broadway #3600  
St. Louis, Missouri 63102  
(314) 259-2000 (t)

ATTORNEYS FOR RESPONDENTS

Respondents Stop "N" Save, Inc., d/b/a El Cheapo Plus #7 and Roy Rahal propose the following to be included in the Record on Appeal:

Transcripts

1. Transcript of October 14, 2015 Hearing
2. Transcript of Roy Rahal Deposition, June 2, 2015 (in its entirety)
3. Transcript of Reginald Morton Deposition, April 24, 2015 (in its entirety)
4. Transcript of Charles Taylor Deposition, June 2, 2015 (in its entirety)

Pleadings:

1. Original Complaint, October 9, 2013
2. Amendment to Complaint, December 4, 2013
3. Amended Complaint, June 9, 2014
4. Rahal's Answer to Amended Complaint, July 14, 2014
5. El Cheapo's Answer to Amended Complaint, July 14, 2014

Motions and Memoranda<sup>1</sup>

1. Respondents' Motion for Summary Judgment, April 27, 2015
2. Rahal's Amended Motion For Summary Judgment, May 13, 2015
3. Respondents' Motion to Dismiss for Vexatious Litigation, September 18, 2015
4. Respondents' Memorandum in Support of Motion for Summary Judgment, October 9, 2015
5. Respondents' Memorandum in Support of Motion to Dismiss for Vexatious Litigation, September 18, 2015
6. Appellant's Motion for Summary Judgment, June 15, 2015
7. Appellant's Motion for Sanctions, August 3, 2015
8. Appellant's Motion for Leave to Amend, August 21, 2015
9. Respondents' Memorandum in Opposition of Appellant's Motion for Summary Judgment, October 9, 2015
10. Respondents' Memorandum in Opposition of Appellant's Motion for Leave to Amend, October 9, 2015
11. Respondents' Memorandum in Opposition of Appellant's Motion for Sanctions, October 9, 2015

Orders

1. Order on Various Motions, November 20, 2015
2. Order of Dismissal, June 2, 2014

Other

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<sup>1</sup> This includes all exhibits referenced and/or included in Respondents' memoranda.

12. DMV Records of Odell Morton
13. Rental Agreement
14. Supplemental Responses to Requests for Admissions, March 11, 2014
15. Supplemental Answers to Interrogatories, March 11, 2014
16. Supplemental Answers to Interrogatories, September 11, 2015
17. Affidavit of Stephen Winkelman, October 9, 2015

Pursuant to Rule 209(c), SCACR, counsel for Respondents certify that this Designation contains no matter that is irrelevant to this appeal.

Respectfully submitted,

**GALLIVAN WHITE & BOYD, P.A.**

By:



Gray T. Culbreath  
James E. Brogdon, III  
Jessica A. Waller  
GALLIVAN, WHITE & BOYD, P.A.  
1201 Main Street, Suite 1200  
Post Office Box 7368(29202)  
Columbia, South Carolina 29201  
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**ATTORNEYS FOR RESPONDENTS**

Columbia, South Carolina  
February 10, 2016.

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PROOF OF SERVICE

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Gray T. Culbreath  
James. E. Brogdon, III  
Jessica A. Waller  
GALLIVAN, WHITE & BOYD, P.A.  
1201 Main Street, Suite 1200  
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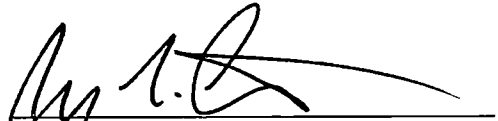
FEB 10 2016

SC Court of Appeals

I certify that on February 10, 2016, I served a copy of Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal by United States Mail, postage prepaid to the following:

Charles Taylor  
332 Myrtle Beach Highway  
Sumter, SC 29153

By:

  
Gray T. Culbreath  
James E. Brogdon, III  
Jessica A. Waller  
GALLIVAN, WHITE & BOYD, P.A.  
1201 Main Street, Suite 1200  
Post Office Box 7368(29202)  
Columbia, South Carolina 29201  
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Randy J. Soriano (*pro hac vice*)  
Julia Fenwick Ost (*pro hac vice*)  
Bryan Cave, LLP  
211 N. Broadway #3600  
St. Louis, Missouri 63102  
(314) 259-2000 (t)

ATTORNEYS FOR RESPONDENTS

Columbia, South Carolina  
February 10 2016.



GRAY T. CULBREATH  
Direct Dial: 803.724.1850  
gculbreath@gwblawfirm.com

Gallivan, White & Boyd, P.A.  
ATTORNEYS AT LAW

1201 Main Street, Suite 1200  
Post Office Box 7368 (29202)  
Columbia, South Carolina 29201  
Telephone 803.779.1833  
Facsimile 803.779.1767  
www.GWBlawfirm.com

February 10, 2016

**VIA HAND-DELIVERY**

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

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**SC Court of Appeals**

**Re: Charles Taylor v. U-Haul Corporation, et al.**  
**Appellate Case No. 2015-002481**  
**GWB File No.: 8566-1**

Dear Ms. Kitchings:

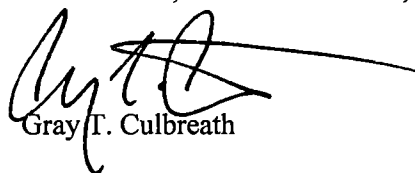
Enclosed please find the original and two copies of Respondents' Initial Brief, Respondents' Designation Of Matter To Be Included In The Record On Appeal and Proof of Service regarding the above-referenced matter. Please file the originals and return clocked copies to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

By copy of this letter, as evidenced on the attached Proof of Service, I am serving the *Pro Se Appellant* with the same.

With kind regards, I am

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Gray T. Culbreath

GTC/ct  
Enclosures  
cc: Charles Taylor, *Pro Se Appellant*