

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM DARLINGTON COUNTY
COURT OF COMMON PLEAS
THE HONORABLE LARRY B. HYMAN, JR.
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2015-001907
CIVIL ACTION NO. 2012-CP-16-00301

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FEB 29 2016
SC Court of Appeals

Haley Jefferson,
As Personal Representative of the Estate of
Michael Jefferson,

APPELLANT,

versus

Landmark Inn 786 Hospitality, LLC,

RESPONDENT.

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Landmark Inn 786 Hospitality, LLC (“Landmark Inn”), Respondent in the above referenced matter, proposes the following be included in the Record on Appeal:

1. Complaint, filed March 30, 2012;
2. Answer, filed May 3, 2012;
3. Landmark Inn’s Motion for Summary Judgment, filed January 2, 2015;
4. Landmark Inn’s Memorandum in Support of Motion for Summary Judgment, filed January 28, 2015 with accompanying exhibits:

Exhibit A – Jefferson SLED Records;

Exhibit B – Excerpts of the Deposition of Haley Jefferson;

Exhibit C – Excerpts of the Deposition of Cheryl McCall;

Exhibit D – Royal SLED Records;

Exhibit E – Excerpts of the Deposition of Brian Rudick;

Exhibit F – Graham SLED Records;

Exhibit G – May 31, 2009 Incident Report;

Exhibit H – Excerpts of the Deposition of Jaffar Hussain;

Exhibit I – Darlington County Clerk of Court Records;

Exhibit J – July 1, 2009 Incident Report; and

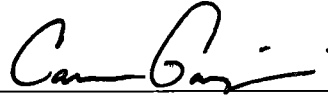
Exhibit K – April 12, 2010 Incident Report;

5. Order Granting Summary Judgment; filed July 8, 2015;
6. Plaintiff's Motion for Reconsideration, filed July 21, 2015;
7. Landmark's Memorandum in Opposition to the Motion for Reconsideration, filed September 1, 2015;
8. Order Denying Motion for Reconsideration, filed September 2, 2015;
9. Transcript of February 2, 2015 Hearing before The Honorable Larry B. Hyman, Jr.; and
10. Transcript of September 1, 2015 Hearing before The Honorable Larry B. Hyman, Jr.

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

[signature on following page]

Respectfully submitted,



Steven J. Pugh
Carmen V. Ganjehsani
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(803) 771-4400
**ATTORNEYS FOR RESPONDENT
LANDMARK INN786 HOSPITALITY,
LLC**

February 26, 2016.

CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondent Landmark Inn 786 Hospitality, LLC, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated February 26, 2016, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Kevin M. Barth, Esquire
Ballenger, Barth & Hoefler, L.L.P.
205 North Irby Street
Post Office Box 107
Florence, South Carolina 29503
Counsel for Appellant

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**ATTORNEYS FOR RESPONDENT
LANDMARK INN786 HOSPITALITY,
LLC**

Dated: February 26, 2016.

Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

February 26, 2016

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *Haley Jefferson, as Personal Representative of the Estate of Michael Jefferson*
v. Landmark Inn 786 Hospitality, LLC
Appellate Case No. 2015-001907
Case No.: 12-CP-16-301
RPR File No.: 7534-035

Dear Ms. Kitchings:

Enclosed for filing are the original Initial Brief of Respondent Landmark Inn 786 Hospitality, LLC and the Respondent's Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our original Certificates of Service.

By copy of this letter, we are this day serving a copy of our Initial Brief and Designations on opposing counsel.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,



Carmen V. Ganjehsani

CVG/rmm

Enclosures

cc: Kevin M. Barth
Steven J. Pugh

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7534-035

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