

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Common Pleas Court

William P. Keesley, Circuit Court Judge

Appellate Case No. 2015-001153

RECEIVED

MAR 01 2016

SC Court of Appeals

Kay F. PaschalRespondent-Appellant,

v.

Leon Lott, the Duly Elected Sheriff of
Richland County, South Carolina Appellant-Respondent.

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

The undersigned, as counsel for Respondent/Appellant Kay F. Paschal pursuant to Rule 209, SCACR, proposes the following be included in the Record on Appeal. Undersigned counsel certifies, pursuant to Rule 209(c) SCACR that the designation contains no matter which is irrelevant to the appeal.

1. Order regarding Defendant's Post Trial Motions issued by the Honorable William P. Keesley, filed December 11, 2014;
2. Order Denying Motion to Alter or Amend issued by the Honorable William P. Keesley, filed April 30, 2015;
3. Verdict Form;
4. Complaint;
5. Answer and Counterclaim;

6. Motion to Reduce Verdict, or in the Alternative, Motion for a New Trial;
7. Motion for a New Trial Pursuant to Thirteenth Juror Doctrine;
8. Motion for JNOV or, in the alternative, Motion for a New Trial Absolute;
9. Motion to Reconsider;
10. Defendant's Memorandum of Law in Support of Post Trial Motions;
11. Plaintiff's Memorandum of Law in Opposition to Defendant's Post Trial Motions;
12. Notice of Appeal;
13. Notice of Cross Appeal;
14. Trial Transcript, July 21-24, 2014, pp. 28-40; 113-896;
15. Trial Transcript, July 25, 2014, pp. 100-128;
16. Motion Hearing Transcript, September 5, 2014;
17. Plaintiff's Exhibits 1 - 24

Respectfully submitted,

By: 

S. Jahue Moore
Stanley L. Myers
John C. Bradley, Jr.
MOORE TAYLOR LAW FIRM, PA
1700 Sunset Boulevard
West Columbia, SC 29169
803-796-9160
803-791-8410 (Fax)

ATTORNEYS FOR RESPONDENT/
APPELLANT KAY F. PASCHAL

West Columbia, South Carolina

February 29, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Common Pleas Court

William P. Keesley, Circuit Court Judge

Appellate Case No. 2015-001153

RECEIVED

MAR 01 2016

SC Court of Appeals

Kay F. Paschal.....Respondent/Appellant,

v.

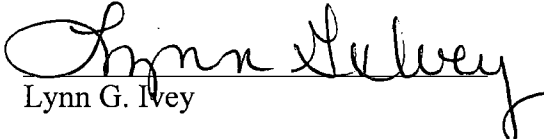
Leon Lott, the Duly Elected Sheriff of
Richland County, South Carolina Appellant/Respondent.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of the Moore Taylor Law Firm, P.A., certify that I have served the Respondent/Appellant's Designation of Matter by United States mail, in an envelope with sufficient postage affixed there to, upon all counsel of record on February 29, 2016.

Andrew W. Lindemann, Esquire
Davidson & Lindemann, PA
P.O. Box 8568
Columbia, SC 29202-8568

Patrick J. Frawley, Esquire
Davis Frawley, LLC
P. O. Box 489
Lexington, SC 29071-0489


Lynn G. Ivey

West Columbia, South Carolina

February 29, 2016

February 29, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201

RE: Kay F. Paschal v. Leon Lott, the Duly Elected Sheriff of Richland
County, South Carolina
Appellate Case No. 2015-001153

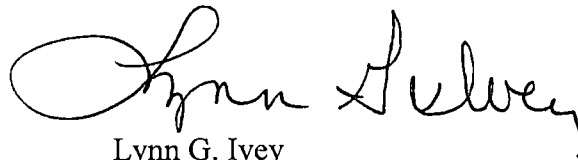
Dear Ms. Kitchings:

Enclosed please find the original and five (5) copies of Respondent/Appellant's Initial Appellant's Brief and Designation of Matter in the above referenced matter. We would appreciate your filing the original and returning the extra copies. A self addressed, stamped envelope is enclosed for your convenience.

By copy of this letter I am providing counsel with a copy of the same.

Thank you for your assistance in this matter. If you have any questions or need any additional information and/or documentation, please do not hesitate to contact our office.

Sincerely,



Lynn G. Ivey
Assistant to John C. Bradley, Jr.

Enclosures

cc: Andrew F. Lindemann, Esquire
Patrick J. Frawley, Esquire

RECEIVED
MAR 01 2016
SC Court of Appeals

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Sarah Taylor Cassidy
Gregory R. Close

Robert D. Hazel
OF COUNSEL
Billy C. Coleman
RETIRED

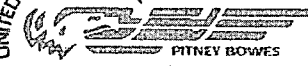
First Class

MTI MOORE | TAYLOR
LAW FIRM

PO Box 5709, West Columbia SC 29171
1700 Sunset Boulevard, West Columbia SC 29169



UNITED STATES POSTAGE



02 1M \$ 07.35⁰
0004275741 FEB 29 2016
MAILED FROM ZIP CODE 29169

RECEIVED

MAR 01 2016
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201