

RECEIVED

MAR 09 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
In the Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Circuit Case No. 2013-CP-40-7214

Appellate Case No. 2015-001638

Patricia B. Cathey Respondent,

v.

Alma Patterson Creighton and William Kinzley Defendants,

Of whom Alma Patterson Creighton is the Appellant.

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


Appellant proposes the following to be included in the Record on Appeal:

1. Complaint;
2. Answer;
3. Trial Transcript pp. 38-180;
4. Verdict Form;
5. Plaintiff's Motion for New Trial *Nisi Additur*, or in the Alternative, for a New Trial based on the Thirteenth Juror Doctrine, or Alternatively, Request for New Trial;

6. Defendant's Memorandum in Opposition to Plaintiff's Motion for a New Trial *Nisi Additur*, or in the Alternative, for a New Trial Based on the Thirteenth Juror Doctrine, or Alternatively, Request for *Additur*;
7. Defendant's Proposed Order;
8. Order Granting New Trial;
9. Notice of Appeal.

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

TURNER, PADGET, GRAHAM & LANEY, P.A.



Joshua D. Shaw (S.C. Bar # 77835)
Patrick D. Quinn (S.C. Bar # 100215)
Post Office Box 1473
Columbia, SC 29202
(803) 254-2200
jshaw@turnerpadget.com
pquinn@turnerpadget.com

ATTORNEYS FOR APPELLANT

March 9, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

MAR 09 2016

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Circuit Case No. 2013-CP-40-7214

Appellate Case No. 2015-001638

Patricia B. Cathey Respondent,

v.

Alma Patterson Creighton and William Kinzley Defendants,

Of whom Alma Patterson Creighton is the Appellant.

PROOF OF SERVICE

I certify this 9th day of March 2016 that I have served a copy of Appellant's Designation of Matter for Record on Appeal upon other counsel of record, by mailing same, postage prepaid in the United States mail, addressed to the following:

David A. Fedor, Esquire
1122 Lady Street, Suite 710
Columbia, SC 29202-1176

J. Lewis Cromer, Esquire
P.O. Box 11675
Columbia, SC 29211

ATTORNEYS FOR RESPONDENT

[Signature follows on next page]

March 9th, 2016

By:  _____

Joshua D. Shaw (Bar No. 77835)
TURNER PADGET GRAHAM & LANEY P.A.
Post Office Box 1473
Columbia, SC 29202
Phone: (803) 227-4310
Fax: (803) 400-1554

ATTORNEY FOR APPELLANT

Turner | Padget

Joshua D. Shaw

REPLY TO:

JShaw@TurnerPadget.com
Direct dial: 803-227-4310
Direct Fax: 803-400-1554

March 9, 2016

RECEIVED

MAR 09 2016

SC Court of Appeals

VIA HAND DELIVERY

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

Re: Patricia B. Cathey v. Alma Patterson Creighton and William Kinzley
Case No. 2015-001638
Our File No. 1464.7321

Dear Ms. Kitchings:

Enclosed please find the following documents for filing on behalf of the *Appellant* (Alma Patterson Creighton):


1. Appellant's Initial Brief with Proof of Service
(unbound original and one copy for return)
2. Appellant's Designation of Matter for the Record as with Proof of Service
(unbound original and one copy for return)

Please file the originals in your office and return a clocked copy of each to us via our courier. Thank you for your assistance in this matter, and please do not hesitate to contact me should you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Joshua D. Shaw

JDS/kcc
Enclosures

cc: J. Lewis Cromer, Esquire
David A. Fedor, Esquire