THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
In The Court of Common Pleas

Honorable R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2015-001920

Mother Doe A ..... Appellant,

v.

The Citadel ..... Respondent.

RESPONDENT'S DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD

M. Dawes Cooke, Esq.
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and

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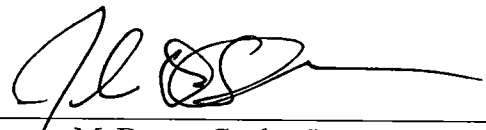
Attorneys for Appellant

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondent, The Citadel, hereby designates the following materials to be included in the Record on Appeal in this matter. Unless otherwise expressly stated, each item designated is to include *all* attachments or exhibits to the original of the referenced item. Respondent expressly reserves the right to seek supplementation to the record pursuant to Rules 209 and 212, SCACR. In addition to the matters designated by Appellant, which designations are incorporated herein by reference, Respondent designates the following matters for inclusion in the Record on Appeal:

1. December 12, 2013 Plaintiff's Amended Complaint
2. February 5, 2014 Answer to Plaintiff's Amended Complaint
3. May 2,2 014 Notice of Motion and Motion for Summary Judgment
4. September 19, 2014 Defendant's Memorandum in Support of Motion for Summary Judgment
5. January 23, 2015 Reply in Support of Motion in Limine Regarding Damages
6. January 26, 2015 Notice of Motion and Renewed Motion for Summary Judgment (with attachments)
7. February 2, 2015 Form 4 Order Granting Renewed Motion for Summary Judgment
8. May 29, 2015 Order Granting Renewed Motion for Summary Judgment
9. August 6, 2015 Order Denying Plaintiff's Motion to Alter or Amend

Respondent certifies, pursuant to S.C.A.C.R., Rule 209(c), that the designations set forth above are relevant to the appeal in this matter, and that it has not designated any matter which is irrelevant to the issues before the Court.



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Attorneys for Respondent The Citadel

Dated: March 4, 2016
Charleston, South Carolina

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PROOF OF SERVICE

I certify that I have served the Respondent's Designation of Matter for Inclusion in the Record on Appellant Mother Doe A by depositing a copy of it in the United States Mail, postage prepaid, on March 4, 2016, addressed to their attorneys of record, Allan P. Sloan, III, Esq., Pierce, Herns, Sloan & Wilson, LLC, 321 East Bay St., Charleston, SC 29401 and Gregg Meyers, Esq., Jeff Anderson & Associates, P.A., 366 Jackson Street Suite 100, Saint Paul, MN 55101

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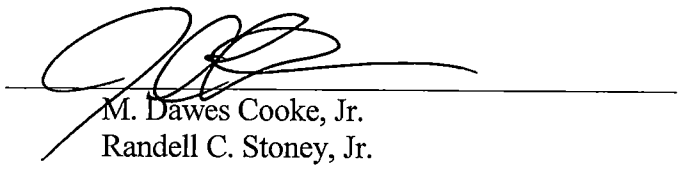

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March 4, 2016

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

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RE: Mother Doe A v. The Citadel
Appellate Case No.: 2015-001920
BWPH File No.: 1.521

Dear Ms. Kitchings:

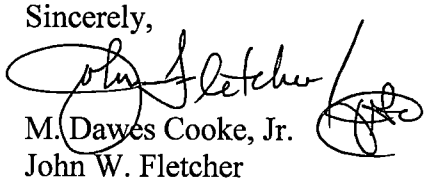
Enclosed for filing please find the original and one (1) copy of each of the following:

(1) Initial Brief of Respondent;
(2) Respondent's Designation of Matter for Inclusion in the Record; and,
(3) Proofs of Service.

We would appreciate if you would file the original documents and return the filed, stamped copies to us in the self-addressed, stamped envelope provided.

By copy of this letter, we are serving copies of the enclosures upon counsel of record.

Sincerely,



M. Dawes Cooke, Jr.
John W. Fletcher

MDCjr/JWF/jgc
Enclosures

cc: Allen P. Sloan, III, Esquire
Gregg Meyers, Esquire

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