

RECEIVED

MAR 30 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

Case No.: 2014-CP-24-00396

Tony King and Rosella King, Appellants,

v.

Christopher T. Miller, Respondent.

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

Respondent proposes the following be included in the Record on Appeal:

1. Defendant's Order Granting Summary Judgment, filed November 13, 2015;
2. Form 4 Order, filed December 16, 2015;
3. Form 4 Order, filed February 4, 2015;
4. Complaint, filed March 26, 2014;
5. Answer, filed June 12, 2014;
6. Defendant's Motion for Summary Judgment, filed January 9, 2015;
7. Plaintiffs' Motion to Alter or Amend, filed November 25, 2015;
8. Transcript of hearing held February 4, 2015;
9. Transcript of Deposition of Tony King, taken December 8, 2014;

10. Transcript of Deposition of Christopher Miller, taken December 8, 2014; and

11. Affidavit of Freddy Pope, sworn January 24, 2015.

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

March 28, 2016

McANGUS GOUDELOCK & COURIE LLC



Helen F. Niser

S.C. Bar No.: 76124

735 Johnnie Dodds Blvd., Suite 200

P.O. Box 650007

Mount Pleasant, South Carolina 29465

(843) 576-2900

Attorneys for Respondent Christopher T. Miller

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

MAR 30 2016
SC Court of Appeals

The Honorable R. Lawton McIntosh, Circuit Court Judge

Case No.: 2014-CP-24-00396

Tony King and Rosella King, Appellants,

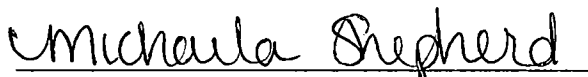
v.

Christopher T. Miller, Respondent.

PROOF OF SERVICE

I certify that on the 28th day of March 2016, I served the **Respondent's Initial Brief** and **Designation of Matter** on Tony King and Rosella King by depositing a copy of it in the United States Mail, postage prepaid, addressed to their attorney of record:

R. Jamison Tinsley, Jr., Esq.
Tinsley & Tinsley, P.C.
212 Oak Ave.
Greenwood, South Carolina 29646



Michaela Shephard
Legal Assistant to Helen F. Hiser
McAngus, Goudelock & Courie LLC
735 Johnnie Dodds Blvd., Suite 200 (29464)
P.O. Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

Attorneys for Respondent Christopher T. Miller

mgc

Reply To
HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

March 28, 2016

RECEIVED

MAR 30 2016

SC Court of Appeals

Via U.S. Mail

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

RE: Tony King and Rosella King vs. Christopher T. Miller
Civil Action No.: 2014-CP-24-00396 (Greenwood)
Date of Incident: January 8, 2013
Carrier Claim No.: HNG4134
MGC File No.: 20527.14135
Appellate Tracking No.: 2016-000077

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

1. original and one copy of the Respondent's Initial Brief;
2. original and one copy of the Designation of Matter to be Included in the Record on Appeal; and
3. original and one copy of Respondent's Proof of Service concerning items one and two.

Please file these documents and return the clocked-in copies in the enclosed, self-addressed stamped envelope.

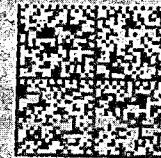
Very truly yours,



Helen F. Hiser

Enclosures

cc: R. Jamison Tinsley, Jr., Esquire



UNITED STATES POSTAGE
PITNEY BOWES
02-1P \$ 002.740
0000841307 MAR 28 2016
MAILED FROM ZIP CODE 29464

mgc | INSURANCE
DEFENSE

POST OFFICE BOX 2980
GREENVILLE, SC 29602

20527.14135/GDM/gcm
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

MAR 30 2016
SC Court of Appeals