

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY

Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

RECEIVED
MAR 17 2016
SC Court of Appeals

Appellate Case No. 2015-000778
C/A No. 2013-CP-23-01762

Carol Simpson,

Appellant,

v.

Frank A. Landgraff, Carol Sutton, Sutton & Associates
Investigations, Inc., Defendants,

Of Whom Frank A. Landgraff is the

Respondent.

RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN APPEAL

Respondent proposes the following materials to be included in the Record on Appeal. I certify that this designation contains no matter which is irrelevant to this Appeal.


NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

Lane W. Davis, SC Bar No. 68796
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Post Office Box 10084 (29603-0084)
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Attorneys for Frank A. Landgraff

Greenville, South Carolina

, 2016

1. All Complaints filed by Appellant: Original Complaint & the First through Fourth Amended Complaints.
2. All Answers filed by Respondent;
3. App. Motion to Proceed Anonymously;
4. *Ex parte Order* Granting Right to Proceed Anonymously;
5. App. Motion for Temporary Restraining Order plus supporting Affidavit of William Mayer;
6. Court Order denying Motion for Temporary Restraining Order;
7. Resp. Motion to Set Aside Order Granting Right to Proceed Anonymously;
8. Resp. Memorandum Supporting Motion to Set Aside Order Granting Right to Proceed Anonymously, plus Exhibits;
9. Court Order Granting Respondent's Motion to Set Aside Order Granting Right to Proceed Anonymously;
10. Greenville County case Docket for above-captioned case;
11. 11/17/2014 Hearing Transcript;
12. Packet of materials served on Landgraff on 6/1/2013;
13. Materials mailed to Landgraff's counsel on May 29, 2013;
14. Affidavit of Carol Simpson from Family Court proceeding;
15. Resp. Rule to Show Cause & Ex. A & B;
16. App. Motion to Reconsider Order Vacating Order to Proceed Anonymously;
17. Order Denying App. Mot. to Reconsider Pseudonym Issues;
18. App. Memo. Supp. Mot. for S.J. Filed in June of 2014;
19. Rule 56(f) Affidavit of Lane Davis;

20. Resp. Motion to Compel Discovery;
21. Resp. Motion for Summ. J.;
22. App. Memo. in Opp. to Resp. Summ. J., plus attachments;
23. Resp. Supp. Memo. in Supp. of Summ. J.;
24. Form 4 Order Granting Summary Judgment;
25. First Order Granting Summary Judgment;
26. Order granting Motion to Reconsider in Part Denying in Part;
27. Amended Order Granting Summary Judgment;
28. Order Denying Motion to Reconsider;
29. 11/10/2010 Fam. Court Temp. Order;
30. NMRS Date-stamped Discovery Requests from Appellant to Respondent;

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PROOF OF SERVICE

I, the undersigned Attorney of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

RESPONDENT'S INITIAL BRIEF & DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Counsel Served:

William G. Mayer
118 West Main Street
Laurens, SC 29360

March 8, 2016

Nelson Mullins

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March 8, 2016

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
PO Box 11629
Columbia, SC 29211

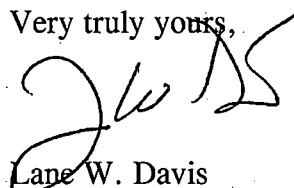
RE: Carol Simpson v. Frank A. Landgraff, Carol Sutton, Carol Sutton & Associates-
Investigations, Inc.
Civil Action No. 2013-CP-23-01762
Appellate Case No. 2015-000778
NMRS File No. 35353/01502

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Respondent's Initial Brief and Designation of Matter to Be Included In the Record On Appeal in the above-referenced matter.

Please return the file stamped copies in the enclosed envelope.

Very truly yours,


Lane W. Davis

LWD:ap
Enclosures
cc: William G. Mayer (w/enclosures)