

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah Brooks Durden, Administrative Law Judge

RECEIVED

Case No. 15-ALC-15-0033-AP
Appellate Case No. 2016-000225

MAY 11 2016
SC Court of Appeals

David Rose, #91858, Respondent,


v.

South Carolina Department of Probation, Parole and
Pardon Services, Appellant.

**RESPONDENT DAVID ROSE'S DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

1. Notice of Appeal filed February 3, 2016
2. Order of the Administrative Law Court filed February 1, 2016
3. Brief of Appellant David Rose filed in the Administrative Law Court November 8, 2015
4. Brief of Respondent DPPPS filed in the Administrative Law Court December 14, 2015
5. Reply Brief of Appellant David Rose filed in the Administrative Law Court January 14, 2016
6. Affidavit of David Lee Rose dated October 20, 2015
7. Affidavit of Douglas Jennings dated January 27, 2014
8. Transcript of motions hearing held on May 19, 2014, 2014-CP-30-161
9. Transcript of motions hearing held on January 5, 2015, 2014-CP-30-161
10. Exhibits 1-7 to the Transcript of the Deposition of Roosevelt Hicks, taken on September 28, 2015 in 2015-ALC-15-0033-AP
11. 2014-CP-30-161 Plaintiff's Request for Production, May 23, 2014
12. 2014-CP-30-161 Defendant's Response to Request for Production, May 27, 2014
13. 2014-CP-30-161 Plaintiff's First Interrogatories, June 2, 2014
14. 2014-CP-30-161 Defendant's Answers to Interrogatories, June 27, 2014
15. 2014-CP-30-161 Plaintiff's Second Interrogatories, June 24, 2014
16. 2014-CP-30-161 Plaintiff's Second Request for Production, June 2, 2014

17. 2014-CP-30-161 Defendant's Objection to Plaintiff's Request for Production, July 28, 2014
18. 15-ALC-15-0033 Appellant's Requests to Produce, August 24, 2015
19. 15-ALC-15-0033 Documents Produced in Response to Appellant's Requests to Produce
20. 15-ALC-15-0033 Respondent's Answers to Interrogatories, September 21, 2015
21. Letter to David Rose from Tommy Evans, April 17, 2006



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Attorneys for Respondent Rose

May 11, 2016

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David Rose, #91858, Respondent,

v.

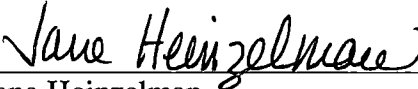
South Carolina Department of Probation, Parole and Appellant.
Pardon Services,

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for David Rose, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by having them hand delivered to the following address(es):

Pleadings: INITIAL BRIEF OF RESPONDENT DAVID ROSE
RESPONDENT DAVID ROSE'S DESIGNATION OF
MATTER TO BE INCLUDED IN RECORD ON APPEAL

Counsel Served: Matthew C. Buchanan, Esquire
S.C. Department of Probation, Parole and Pardon Services
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Jane Heinzelman
Administrative Assistant

May 11, 2016

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SC Court of Appeals

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

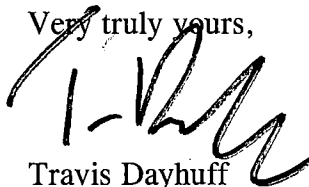
RE: David Lee Rose #91858 v. South Carolina Dept. of Probation, Parole and
Pardon Services - Appeal of 2001 Parole Hearing
Appellate Case No. 2016-000225
Our File No. 33999/01227

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter are the original and one copy of Respondent David Rose's Initial Brief and Designation of Matter to be Included in Record on Appeal. Please return a clocked-in copy to us via our courier.

By copy of this letter to opposing counsel, we are hereby serving them with a copy of this filing.

Very truly yours,



Travis Dayhuff

TD:jh
Enclosures
cc: Matthew C. Buchanan, Esquire