

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
G. Thomas Cooper, Jr., Circuit Court Judge

RECEIVED

AUG 04 2016

Case No. 2014-CP-40-024  
SC Court of Appeals

Carol Goodson-Eaddy.....Appellant,

v.

Travien L. Capers, Gregory A. Brown, Robert Davis, Herbert Bell, James Randolph, Jr.,  
Harry Thompson, James Brown, Frank M. Jones, Edwin L. Rivers, Sr., Lever Thompson,  
Jr., Fred Davis, Harry L. Jones, Sr., David J. Clarkson, Larry B. Brown, Grady Wilson,  
and Dorothy B. Adams.....Respondents.

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

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

1. Notice of Appeal, filed May 11, 2016
2. Order Granting Defendants' Motion to Dismiss or in the Alternative Motion for Summary Judgment, filed April 12, 2016
3. Transcript of Hearing on Defendants' Motion to Dismiss or in the Alternative Motion for Summary Judgment, dated April 6, 2016
4. Defendants' Motion to Quash Plaintiff's Subpoena to Zion Benevolent Baptist Church, filed February 25, 2016
5. Plaintiff's Subpoena to Zion Benevolent Baptist Church, served February 12, 2016
6. Plaintiff's Amended Complaint, filed March 31, 2015
7. Order by Judge Barber on Defendants' Motion to Dismiss, dated March 5, 2015
8. Defendants' Motion to Dismiss, filed November 3, 2014
9. Plaintiff's Amended Complaint, filed October 10, 2014
10. Deposition Transcript of Carol Goodson-Eaddy and exhibits, dated September 3, 2015
11. Deposition Transcript of Travien L. Capers and exhibits, dated September 2, 2015
12. Deposition Transcript of Nadine Taylor and exhibits, dated September 17, 2015
13. Plaintiff's Answers to Defendants' Interrogatories
14. Plaintiff's Responses to Defendants' Requests for Production
15. Zion Benevolent Baptist Church Constitution and By-Laws
16. Email from Travien L. Capers, dated July 22, 2014
17. Letter to Carol Goodson-Eaddy and accompanying envelope, dated August 30, 2014

18. Notice of Special Call Meeting for September 8, 2014
19. Minutes of Annual Meetings, 2012, 2013, and 2014

The undersigned certifies that this Designation of Matter complies with Rule 209(c) SCACR, and contains no matter irrelevant to the appeal.

**PALMETTO LAW CENTER, P.C.**



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**Hammond A. Beale, S.C. Bar # 0599**

**Page M. Kalish, S.C. Bar # 72611**

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**Attorneys for the Appellant Carol Goodson-Eaddy**

August 1, 2016

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
G. Thomas Cooper, Jr., Circuit Court Judge

Case No. 2014-CP-40-6224

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AUG 04 2016

SC Court of Appeals

Carol Goodson-Eaddy.....Appellant,

v.

Travien L. Capers, Gregory A. Brown, Robert Davis, Herbert Bell, James Randolph, Jr.,  
Harry Thompson, James Brown, Frank M. Jones, Edwin L. Rivers, Sr., Lever Thompson,  
Jr., Fred Davis, Harry L. Jones, Sr., David J. Clarkson, Larry B. Brown, Grady Wilson,  
and Dorothy B. Adams.....Respondents.

PROOF OF SERVICE

I certify that I have filed the Designation of Matter to be Included in the Record on  
Appeal and Appellant's Initial Brief with the Clerk of Court for Richland County and served  
opposing counsel by depositing a copy of it in the United States Mail, postage prepaid, on  
August 1, 2016 addressed as follows:

Peter E. Farr, Esq.  
Murphy & Grantland, P.A.  
Attorney at Law  
4406-B Forest Drive  
Columbia, SC 29206

PALMETTO LAW CENTER, P.C.



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Page M. Kalish, S.C. Bar # 72611  
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Attorneys for the Appellant

# Palmetto Law Center, P.C.

ATTORNEYS AT LAW

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August 1, 2016

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SC Court of Appeals

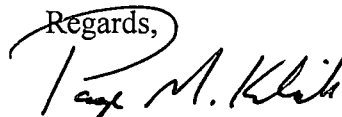
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Carol Goodson-Eaddy v. Travien L. Capers et.al.  
Civil Action: 2014-CP-40-6224  
Appellate Case No.: 2016-000989  
Our File No.: 2014-273

Dear Mrs. Kitchings:

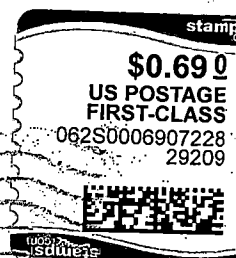
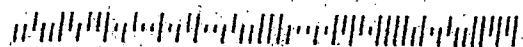
Enclosed for filing please find Appellant's Designation of Matter and Appellant's Initial Brief. By copy of this letter I am serving opposing counsel with a copy of the same.

Thank you for your attention to this matter.

Regards,  
  
Page M. Kalish

Enclosures

cc: Peter Farr, Esq.  
Carol Goodson-Eaddy



COLUMBIA SC 292  
THE 02 AUG 2016 PM

**Palmetto Law Center, P.C.**

ATTORNEYS AT LAW

Post Office Box 9526 • Columbia, South Carolina 29290

The Honorable Jenny Abbott Kitchings  
Clerk of Court

South Carolina Court of Appeals  
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AUG 14 2016  
SC Court of Appeals