

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY

Court of Common Pleas

Michael G. Nettles, Circuit Judge

Appellate Court Case No. 2015-002618

RECEIVED

SEP 28 2016

SC Court of Appeals

Patricia Doller.....Respondent,

v.

Lohr Plumbing, Inc.....Appellant.

DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

1. Order dated November 22, 2015;
2. Transcript of trial, pp.1-550;
3. Transcript of Hearing, dated November 19, 2015, pp 1-13;
4. Video deposition transcript of Dr. Alan Lieberman;
5. Plaintiff's Post Trial Motion: JNOV, 13<sup>th</sup> Juror, New Trial Absolute;
6. Defendant's Memorandum in Opposition to Motion for New Trial;
7. Amended Complaint;
8. Answer to Amended Complaint;
9. Jury Verdict Form.

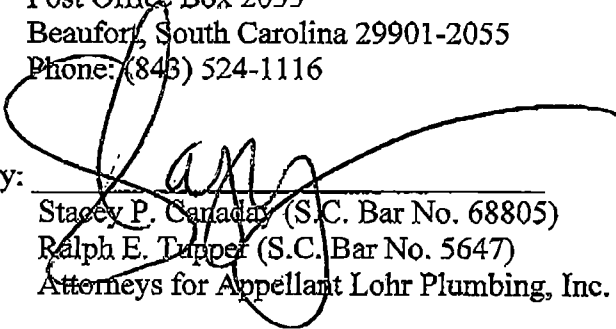
I certify that this designation contains no matter which is irrelevant to this appeal.

(Signature page to follow)

Respectfully submitted,

TUPPER, GRIMSLEY & DEAN, P.A.  
Post Office Box 2055  
Beaufort, South Carolina 29901-2055  
Phone: (843) 524-1116

By:



Stacey P. Canaday (S.C. Bar No. 68805)  
Ralph E. Tupper (S.C. Bar No. 5647)  
Attorneys for Appellant Lohr Plumbing, Inc.

Beaufort, South Carolina  
September 28, 2016

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Michael G. Nettles, Circuit Judge

Circuit Court Case No. 2012-CP-07-4139

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SEP 28 2016

SC Court of Appeals

Patricia Doller.....Respondent,

v.

Lohr Plumbing, Inc.....Appellant.

**PROOF OF SERVICE**

I certify that on September 28, 2016, I served a copy of the within and foregoing Appellant Lohr Plumbing Inc.'s Initial Brief and Designation of Matter to be Included in the Record on Appeal upon all parties via U.S. mail and electronic mail to counsel of record as set forth below:

**Attorneys for Respondent Patricia Doller:**

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(Signature page to follow)

Respectfully submitted,

TUPPER, GRIMSLEY & DEAN, P.A.

By: 

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Ralph E. Tupper (S.C. Bar No. 5647)  
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Inc.

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Beaufort, South Carolina  
September 28, 2016

**TUPPER, GRIMSLEY & DEAN, P.A.**

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JAMES A. GRIMSLEY, III  
ERIN D. DEAN  
STACEY PATTERSON CANADAY  
KATHERINE GRAHAM FERGUSON

\* ALSO ADMITTED IN NEW YORK

September 28, 2016

**VIA U.S. MAIL AND FACSIMILE**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**

SEP 28 2016

**SC Court of Appeals**

**RE: Patricia Doller v. Lohr Plumbing, Inc.**  
**Appellate Case No. 2015-002618**  
**File No.: 22013**

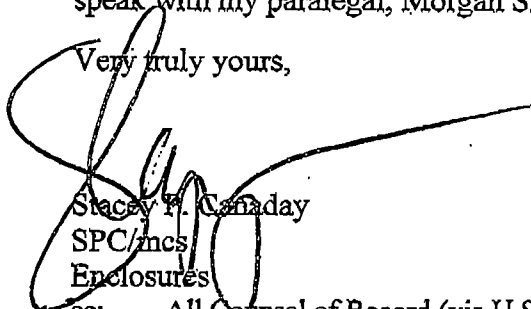
Dear Ms. Kitchings:

Please find enclosed the originals and one (1) copy each of *Initial Brief of Appellant, Designation of Matter to be Included in the Record on Appeal and Proof of Service* on behalf of Appellant Lohr Plumbing, Inc. with regard to the above captioned matter. I would appreciate it if you would file the originals and one (1) copy of each and return the clocked copies to my office in the self-addressed, stamped envelope provided for your convenience.

By copy of this correspondence, together with its enclosures, I am hereby serving a copy of the aforementioned materials on opposing counsel.

Should you have any questions, please feel free to contact me. If I am unavailable, please ask to speak with my paralegal, Morgan Shinaberry.

Very truly yours,



Stacey P. Canaday  
SPC/mcs  
Enclosures

cc: All Counsel of Record (via U.S. Mail and email w/encls)  
Mr. Joe Stubbs, Auto Owners Insurance Company, Claim No. 72-4827-2011 (via email only)

**TUPPER, GRIMSLEY & DEAN, P.A.**

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\* ALSO ADMITTED IN NEW YORK

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**SC Court of Appeals**

**FAX COVER SHEET**

September 28, 2016

To: The Honorable Jenny Abbot Kitchings – (803) 734-1839

From: Stacey P. Canaday

RE: Patricia Doller v Lohr Plumbing, Inc.

Appellate Case No.: 2015-002618

Date of Case: 08-31-15

Our File No.: 22013

Number of Pages: 34, including cover sheet