

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Richland County
Alison Renee Lee, Circuit Court Judge

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SEP 26 2016
SC Court of Appeals

TIMOTHY E. BOOKERT,

RESPONDENT,

V.

SOUTH CAROLINA DEPARTMENT
OF MENTAL HEALTH, AND SOUTH
CAROLINA TREASURER'S OFFICE,

APPELLANT.

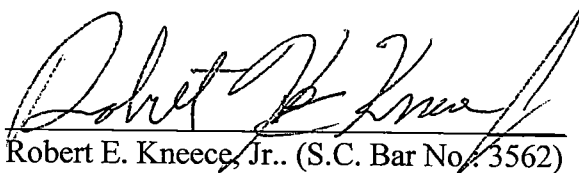
**DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

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

- (1) All material listed in Appellants' designation.
- (2) Respondent's Motion for Summary Judgment.
- (3) Respondent's Motion and Memorandum in Opposition to Appellants' Motion and Memorandum in Support of JNOV or, in the alternative, For a New Trial
- (4) Stipulation as to the amount of funds at issue

- (5) Documents and exhibit related to Devon Sistrunk
- (6) Respondent's Memo Concerning Property Issues dated 11/30/15
- (7) Exhibits:
 - Plaintiff: 1-7
 - Court: 1-3; 5-11
- (8) Transcript of Trial pp. 58-73.

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



Robert E. Kneece, Jr. (S.C. Bar No. 3562)
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2520 Devine Street
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(803) 799-9393
Attorney for Appellant

September 23, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2016-000667
Case No. 2013-CP-40-02443

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SC Court of Appeals

Timothy E. Bookert, Jr.,

Respondent,

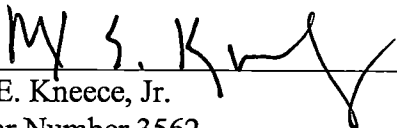
v.

South Carolina Department of
Mental Health, and South Carolina
Treasurer's Office,

Appellants.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Respondent on the South Carolina Department of Mental Health and South Carolina Treasurer's Office by depositing a copy of it in the United States Mail, postage prepaid, on September 23, 2016, address to their attorneys on record, Johanna C. Valenzuela, Esquire, Post Office Box 11549, Columbia, SC 29211 and Jared Q. Libet, Esquire, Post Office Box 11549, Columbia, SC 29211.



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ROBERT E. KNEECE, JR.

REXFORD P. KNEECE

ROBERT E. KNEECE
(1933 - 2000)

ROBERT SIMS BROWN
(1939 - 2004)

WILLIAM O. KNEECE
(1935 - 2012)

September 23, 2016

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SC Court of Appeals

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

RE: Timothy E. Bookert, Respondent, v. South Carolina Department of Mental Health and South Carolina Treasurer's Office, Appellants
Appellate Case No. 2016-000667
Trial Court Case No. 2013-CP-40-02443

Dear Ms. Kitchings:

Enclosed for filing in your office is the original Initial Brief of Respondent and the Designation of Matter in reference to the above referenced matter along with the Certificate of Service.

Also enclosed you will find a copy of the Initial Brief of Respondent and would ask that it be **time stamped** and returned to our office for our file.

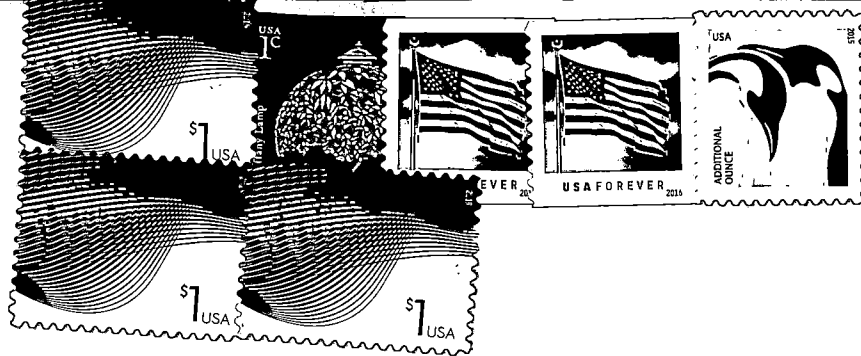
Thanking you, I am,

Sincerely,

KNEECE, KNEECE & BROWN

By:  Robert E. Kneece, Jr.

REKjr:jdd
Enclosures.



KNEECE, KNEECE & BROWN
Attorneys at Law
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Columbia, SC 29205

TO: The Honorable Jenny A. Kitchings
Clerk of Court, S. C. Court of Appeals
P O Box 11629
Columbia, SC 29211

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SC Court of Appeals



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