

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

Appeal from Charleston County  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

---

Appellate Case No. 2016-000419  
Circuit Court Case No. 2013-CP-10-03251

---

**RECEIVED**

AUG 31 2016

SC Court of Appeals

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

---

**APPELLANT'S DESIGNATION OF MATTER**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Appellant*  
*Winsor Custom Homes, LLC*

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

Orders, Judgments, Decrees, or Decisions

1. Order Amending Caption, filed September 2, 2015;
2. Post-Trial Motion Order, filed January 28, 2016;
3. Judgment;

Pleadings

4. Summons and Complaint;
5. Answer;

Transcripts

*Hearings*

6. Trial Transcript;
7. Post-Trial Motion Hearing Transcript;

Other Material or Documents

*Motions, Memoranda, and Discovery Responses*

8. Defendant's Post-Trial Motions with exhibits;

*Documents*

9. Plaintiff's Trial Exhibit 1/Defendant's Exhibit 4 (Funcik Records);
10. Plaintiff's Trial Exhibit 2/Defendant's Exhibit 5 (Charleston ENT Records);
11. Plaintiff's Trial Exhibit 4;
12. Plaintiff's Trial Exhibit 7/Defendant's Exhibit 1 (photos 302 and 303);
13. Plaintiff's Trial Exhibit 8/Defendant's Exhibit 2;
14. Plaintiff's Trial Exhibit 10;
15. Plaintiff's Trial Exhibit 11;
16. Defendant's Trial Exhibit 3 (Omitting the fully redacted pages submitted to lower Court);

17. Court's Exhibit 1;
18. Court's Exhibit 3;
19. Court's Exhibit 9;
20. Court's Exhibit 13;
21. Verdict form;
22. Notice of Appeal.

I certify that this Designation of Matter contains no matter which is irrelevant to this appeal.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: \_\_\_\_\_



Stephen L. Brown (SC Bar No. 66468)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

P.O. Box 993 (29402)

(843) 720-5488

*Attorneys for Appellant*

*Winsor Custom Homes, LLC*

Charleston, South Carolina

Dated: \_\_\_\_\_

8/29/16

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

---

Appeal from Charleston County  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

---

Appellate Case No. 2016-000419  
Circuit Court Case No. 2013-CP-10-03251

**RECEIVED**

AUG 31 2016

SC Court of Appeals

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Appellant*  
*Winsor Custom Homes, LLC*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellant above named, do hereby certify that I have served the **Initial Brief of Appellant** and **Appellant's Designation of Matter** on the above-named Respondent by depositing a copy of the same in the United States Mail, postage prepaid, on August 29, 2016, addressed as follows to Respondent's counsel:

Christy Ford Allen, Esquire  
John A. Massalon, Esquire  
Wills Massalon & Allen, LLC  
P.O. Box 859  
Charleston, SC 29402  
*Attorneys for Respondent*  
*Rosemary Connelly*

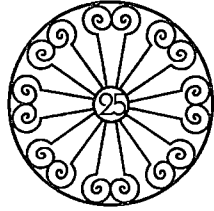
YOUNG CLEMENT RIVERS, LLP

By:

  
\_\_\_\_\_  
Russell G. Hines  
*Attorneys for Appellant*  
*Winsor Custom Homes, LLC*

Charleston, South Carolina

Dated: 8/29/16



**YCR LAW**  
Young Clement Rivers, LLP

Russell G. Hines  
Partner

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

August 29, 2016

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

**RECEIVED**  
AUG 31 2016  
SC Court of Appeals

Re: Rosemary Connelly v. Winsor Custom Homes, LLC  
Appellate Case No.: 2016-000419  
Case No.: 2013-cp-10-03251  
Claim No.: CPP001009129  
YCR File: 10857-20130494

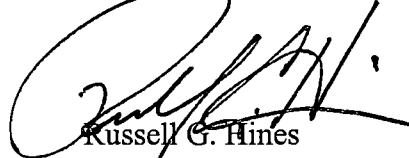
Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and one (1) copy of the **Initial Brief of Appellant**; the original and one (1) copy of **Appellant's Designation of Matter**; and the original and one (1) copy of the **Proof of Service** regarding the same.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines  
Partner

RGH/amj  
Enclosures

cc: Christy Ford Allen, Esquire, Wills Massalon & Allen, LLC  
John A. Massalon, Esquire, Wills Massalon & Allen, LLC

Hasler

PRIORITY MAIL

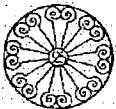
08/29/2016

US POSTAGE \$006.80<sup>0</sup>



ZIP 29401  
011D12603180

**First Class Mail**



**YCRLAW**

25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402-0993

KBB  
10857-  
20130494

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

**RECEIVED**  
AUG 31 2016  
SC Court of Appeals