

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

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Case No. 2011-CP-08-2439

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Indra SI, S.A.,

Respondent,

v.

Rotomotion, LLC, a South  
Carolina Limited Liability  
Company,

Appellant.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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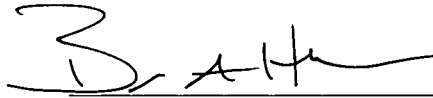
Appellant proposes the following be included in the Record on Appeal:

1. March 2009 Sale Agreement;
2. Wire Transfer Instructions;
3. Letter from Dennis S. D'Annunzio, dated October 28, 2009;
4. Letter from Eduardo Ricardo Viaggio, dated May 31, 2010;
5. Affidavit of Eduardo Ricardo Viaggio;
6. Summons & Complaint, filed September 2, 2012;
7. Affidavit of Service on Rotomotion, LLC filed September 12, 2011;
8. Plaintiff's First Set of Interrogatories;

9. Plaintiff's First Request for Production;
10. Letter from Karen DeJong, dated October 19, 2011;
11. Affidavit of Default, filed November 15, 2011;
12. Defendant's Answer and Counterclaim, filed November 21, 2011;
13. E-mail from Karen DeJong to Brian Hellman, dated November 21, 2011;
14. Plaintiff's Notice and Motion for Summary Judgment or Alternatively to Dismiss Appellant's Counterclaim, filed December 16, 2011;
15. Plaintiff's Memorandum of Law in Support of Motion for Summary Judgment on the Complaint or Alternatively to Dismiss Defendant's Counterclaim filed March 23, 2012;
16. Notice of Hearing;
17. Defendant's Response in Opposition to Plaintiff's Motion of Summary Judgment or Alternatively to Dismiss Defendant's Counterclaim;
18. Plaintiff's Reply in support of Motion for Summary Judgment on the Complaint or Alternatively to Dismiss Defendant's Counterclaim;
19. Transcript of Proceedings held on April 2, 2012;
20. Plaintiff's Proposed Order;
21. Defendant's Proposed Order;
22. Order Granting Plaintiff's Motion for Summary Judgment, filed April 30, 2012;
23. Notice of Appeal, filed May 30, 2012;
24. Appellant's Initial Brief; and

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

October 3, 2012



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ATTORNEYS FOR RESPONDENT

THE STATE OF SOUTH CAROLINA  
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**CERTIFICATE OF SERVICE**

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I, the undersigned Legal Assistant of the law office of Hellman & Yates, P.A. attorney for Respondent, do hereby certify that I have served all counsel in this action with a copy of the Respondent's Initial Brief with the Designation of Matter to be Included in the Record on Appeal by mailing a copy of the same by United States Mail, postage prepaid, to the following address:

Counsel Served: Karen DeJong, Esq.  
DeJong Law Firm, LLC  
940 Johnnie Dodds Blvd., Suite 203  
Mount Pleasant, SC 29464

  
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Sidsel Berry, Administrative Assistant

October 3, 2012