

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Charleston County  
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Judge

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Appellate Case No.: 2016-000419  
Common Pleas Case No.: 2013-CP-10-3251

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Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Appellant.

---

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

---

Christy Ford Allen (SC Bar #15649)  
John A. Massalon (SC Bar #10279)  
WILLS MASSALON & ALLEN LLC  
Post Office Box 859  
Charleston, South Carolina 29402  
(843) 727-1144  
ATTORNEYS FOR RESPONDENT

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SC Court of Appeals

In addition to the matters designated by the Appellant, Respondent proposes the following be included in the Record on Appeal:

18. Court's Exhibit 3 (to clarify three (3) pages with bates labels #605-607)
23. Plaintiff's Memorandum in Opposition to Defendant's Post -Trial Motions with Exhibit
24. Demonstrative from Funcik Testimony entitled Anosmia – Loss of Sense of Smell

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

October 27, 2016



Christy Ford Allen (SC Bar #15649)  
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ATTORNEYS FOR RESPONDENT

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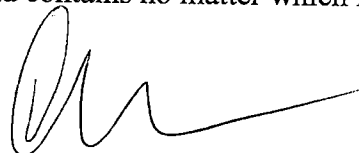
Appellant.

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**CERTIFICATE OF COUNSEL**

---

The undersigned certifies that Respondent's Designation of Matter to be Included in the Record on Appeal complies with Rule 209(c), SCACR and contains no matter which is irrelevant to the appeal.



---

Christy Ford Allen (SC Bar #15649)  
John A. Massalon (SC Bar #10279)  
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ATTORNEYS FOR RESPONDENT

CHARLESTON, SOUTH CAROLINA

October 27, 2016

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**PROOF OF SERVICE**

I certify that I have served Respondent's Designation of Matter by depositing a copy of it in the United States Mail, postage prepaid, on October 27, 2016 addressed to:

Stephen L. Brown, Esquire (SC Bar #66468)  
Russell G. Hines, Esquire (SC Bar #72100)  
Young Clement Rivers, LLP  
Post Office Box 99  
Charleston, South Carolina 29402  
(843) 720-5488

**ATTORNEYS FOR APPELLANT**



Christy Ford Allen, Esquire (SC Bar #15649)  
John A. Massalon, Esquire (SC Bar #10279)  
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**ATTORNEYS FOR RESPONDENT**

CHARLESTON, SC

# WMA

WILLS MASSALON & ALLEN LLC

97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29402  
Phone: 843-727-1144 • Fax: 843-727-7696 • [www.wmalawfirm.net](http://www.wmalawfirm.net)

October 27, 2016

Direct Dial: (843) 793-6041

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

RE: Rosemary Connelly v. Winsor Custom Homes, LLC  
Appellate Case No.: 2016-000419  
Our File No.: 1088-1

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**SC Court of Appeals**

Dear Ms. Kitchings:

In regard to the above-referenced matter, enclosed please find an original and one (1) copy of the following:

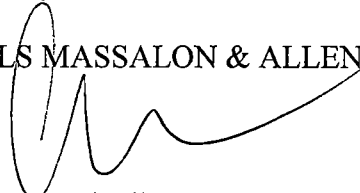
1. Respondent's Initial Brief;
2. Proof of Service of Respondent's Initial Brief;
3. Respondent's Designation of Matter;
4. Proof of Service of Respondent's Designation of Matter; and
5. Certificate of Counsel.

Please file the originals, file-stamp the copies, and return the file-stamped copies to me in the self-addressed, stamped envelope provided. By copy of this correspondence, I am serving the same upon all counsel of record. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC

  
Christy Ford Allen  
[callen@wmalawfirm.net](mailto:callen@wmalawfirm.net)

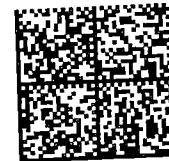
CFA/cb

Enclosures

cc: Ms. Rosemary Connelly (c/o Mr. William Connelly)  
Stephen L. Brown, Esquire  
Russell G. Hines, Esquire



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