

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appellate Case No. 2015-002057

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Daniel D. Hall, Circuit Court Judge

Case No.: 2013-CP-23-02017

Isiah James, Jr. and George Lee Tomlin, Plaintiffs,
of whom George Lee Tomlin is the

Appellant,

v.

South Carolina Department of Corrections,

Respondent.

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

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

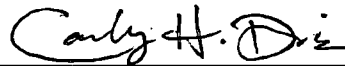
1. Plaintiff James's Motion for Summary Judgment.
2. Plaintiffs' Complaint filed April 11, 2013.
3. Notice of Removal filed July 15, 2013.
4. Answer to Amended Complaint filed July 15, 2013.
5. Amended Complaint filed July 17, 2013.
6. Isaiah James's Supplemental Complaint filed December 4, 2014.
7. Answer to Supplemental/ Amended Complaint filed December 22, 2014.
8. United States District Court Order dated January 13, 2014.

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SC Court of Appeals

9. Report and Recommendation dated January 30, 2014.
10. United States District Court Order dated March 18, 2014.
11. Affidavit of Debra Long regarding James dated December 3, 2014.
12. Affidavit of Debra Long regarding Tomlin dated December 3, 2014.
13. Defendant's Motion for Summary Judgment filed on June 3, 2015.
14. The South Carolina Court of Appeals Order dated November 23, 2010.
15. Plaintiff James's Memorandum of Law in Support of Summary Judgment including attachments, specifically, Administrative Law Court Order issued by The Honorable Carolyn C. Matthews on February 7, 2006.
16. Order of Circuit Court Judge Hall issued August 31, 2015.



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Attorneys for Respondent

November ^{24th} 2016
Greenville, South Carolina

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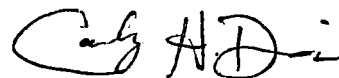
South Carolina Department of Corrections,

Respondent.

CERTIFICATION OF COUNSEL

The undersigned counsel for the Respondent hereby certifies that the Designation of Matter contains all materials proposed to be included in the Record on Appeal. Upon information and belief, all materials designated are relevant to this appeal and in accordance with Rule 209.

Respectfully submitted,



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November 4th, 2016
Greenville, South Carolina

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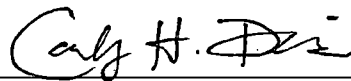
South Carolina Department of Corrections,

Respondent.

PROOF OF SERVICE

I hereby certify that the undersigned attorney for the respondent in the within action did on this 4th day of November, 2016 serve the Appellant with a copy of **Respondent's Motion to Accept Respondent's Initial Brief and Designation of Matter, Respondent's Initial Brief, and Respondent's Designation of Matter** by placing a copy of same in an envelope addressed as below, proper postage affixed thereto:

George Lee Tomlin, #166361
Ridgeland Correctional Institution
CA-22, POB 2039
Ridgeland, South Carolina 29936



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Greenville, South Carolina