

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS

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Joseph M. Strickland, Master-in-Equity Judge

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Case No. 2008- CP-40-03076

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**RECEIVED**

NOV 16 2016

**SC Court of Appeals**

Tiffany's Café & Bakery on Devine, Inc.....Respondent,

v.

James S. Archer.....Appellant.

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

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Appellant proposes the following to be included in the consolidated Record on Appeal.

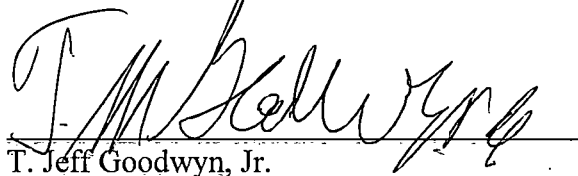
1. Order Denying Motion to Alter or Amend Judgment dated July 7, 2016.
2. Amended Order for Judgement dated March 25, 2016.
3. Order dated September 25, 2015.
4. Consent Order referring matter to Master in Equity.
5. Plaintiff's Notice of Motion to Alter or Amend Order pursuant to Rules 52(b), 59(e) and 60(b), SCRCP.
6. Defendant's Motion to Alter or Amend.
7. Complaint.

8. Answer and Counterclaim.
9. Reply of Plaintiff to Answer and Counterclaim.
10. Transcript of Hearing from July 29, 2015, pp. 1-224.
11. Transcript of Hearing from February 8, 2016, pp. 1-16.
12. Transcript of Hearing from June 13, 2016, pp. 1-18.
13. Plaintiff's Trial Exhibit 1.
14. Plaintiff's Trial Exhibit 2.
15. Plaintiff's Trial Exhibit 3.
16. Plaintiff's Trial Exhibit 4.
17. Plaintiff's Trial Exhibit 5.
18. Plaintiff's Trial Exhibit 6.
19. Plaintiff's Trial Exhibit 7.
20. Defendant's Trial Exhibit 1.
21. Defendant's Trial Exhibit 2.
22. Defendant's Trial Exhibit 4.
23. Defendant's Trial Exhibit 6.
24. Defendant's Trial Exhibit 10.
25. Defendant's Trial Exhibit 11.
26. Court's Trial Exhibit 1.
27. Letter to Court from Carlos W. Gibbons, Jr. dated May 21, 2015

Pursuant to Rule 209(c), SCACR, I certify that this Designation contains no matter which is irrelevant to the appeal.

- signature page to follow -

GOODWYN LAW FIRM, LLC

A handwritten signature in black ink, appearing to read "T. Jeff Goodwyn, Jr.", written over a horizontal line.

T. Jeff Goodwyn, Jr.

Goodwyn Law Firm, LLC

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[JGoodwyn@Goodwynlaw.com](mailto:JGoodwyn@Goodwynlaw.com)

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Attorney for Appellant

Columbia, South Carolina  
November 16, 2016

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity Judge

Case No.: 2008-CP-40-03076

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SC Court of Appeals

Tiffany's Café & Bakery on Devine, Inc.....Respondent,

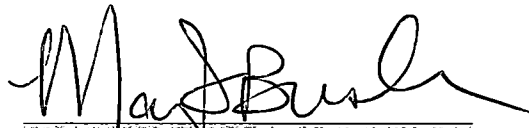
v.

James S. Archer.....Appellant.

**PROOF OF SERVICE**

I certify that I have served the **Appellant's Initial Brief** along with **Appellant's Designation of Matter to be Included in the Record on Appeal** on Carlos W. Gibbons, Jr., Counsel for the Respondent at the address below by depositing a copy of same in the United States Mail, postage prepaid, on November 16, 2016.

Carlos W. Gibbons, Jr., Esquire  
Ashley & Gibbons, P.A.  
712 Calhoun Street, Suite B  
Columbia, SC 29201



Mary S. Bush  
Paralegal to T. Jeff Goodwyn, Jr., Esquire  
Goodwyn Law Firm, LLC  
2519 Devine Street  
Suite A  
Columbia, South Carolina 29205  
(803) 251-4517

November 16, 2016

# GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.\*  
Christopher J. Archer

Special Counsel:  
Rachel G. Peavy

Of Counsel:  
E. Crosby Lewis

\*Also Licensed in Georgia

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November 16, 2016

## VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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SC Court of Appeals

RE: *Tiffany's Café and Bakery on Devine, Inc. vs. James S. Archer*  
*Appellant Case No.: 2016-001514*  
*Our File No.: 3000-0271*

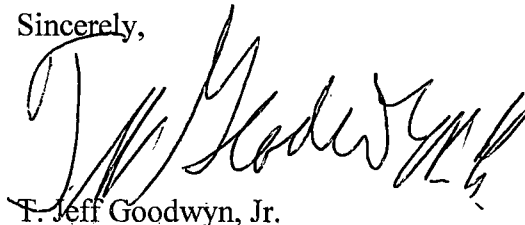
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the **Initial Brief of Appellant and Designation of Matter to Be Included in the Record on Appeal**, along with the Proof of Service, in regard to the above-referenced matter.

By copy of this letter and as evidenced by the attached Proof of Service, I am serving a copy of the Initial Brief of Appellant and Designation of Matter upon Carlos W. Gibbons, Jr., Esquire, attorney for the Respondent.

Thank you for your assistance with this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb  
Enclosures

cc: Carlos W. Gibbons, Jr., Esquire