

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

NOV 28 2016

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No.: 2014-CP-26-07862
Appellate No.: 2016-000522

Karon Mitchell and Kyle Mitchell,Appellant,

v.
Rabon & Rabon, Inc.,Respondent.

DESIGNATION OF MATTER TO BE INCLUDED IN RECORD
OF RESPONDENTS RABON & RABON, INC.

The Respondent, Rabon & Rabon, Inc. (“Respondent”), designate the following materials to be included in the record on appeal pursuant to Rule 209 of the South Carolina Appellate Court Rules:

ORDERS

- a. February 8, 2016 Order Denying Defendants’ Motion, Granting Plaintiff’s Motion, Ordering Defendants to Perform Pursuant to Mediation Settlement Agreement, and Enjoining Defendants from Taking Actions Inconsistent with Mediation Settlement Agreement
- b. Form 4 Order dated January 20, 2016 hearing on Plaintiff’s Motion to Compel Settlement and Defendants’ Motion to Dismiss
- c. Form 4 Order dated February 4, 2016, filed February 10, 2016 denying Defendants’ Rule 59 Motion

PLEADINGS

- a. Affidavit of Jack I. Rabon dated December 10, 2015
- b. Affidavit of Susie "Pearl" Floyd dated December 10, 2015

TRANSCRIPTS

- a. Transcript of January 20, 2016 hearing before Judge Culbertson

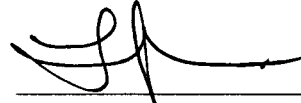
MEMORANDA AND OTHER MATERIALS

- a. Agreement to Mediation dated October 30, 2015
- b. Defendants' 10:20 p.m. email to Judge Culbertson dated January 19, 2016
- c. Plaintiff's Motion for Temporary Restraining Order, Temporary Injunction, and Order Compelling Settlement dated December 10, 2015
- d. Defendants' Motion for Dismissal of the Mediation Settlement Agreement on the Grounds of Coercion and Mental Duress dated December 15, 2015
- e. Plaintiff's Memorandum in Opposition to Defendants' Motion to Dismiss the Mediation Settlement Agreement dated January 19, 2016
- f. Defendants' document entitled "In Support of Defendants' Motion for Reconsideration of the Purported Mediated Settlement Agreement" dated February 2, 2016
- g. Defendants' second document entitled "In Support of Defendants' Motion for Reconsideration of the Purported Mediated Settlement Agreement" including attached exhibits dated February 2, 2016.

CERTIFICATION

We certify that this Designation contains no matter which is irrelevant to this Appeal.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "H. U. Golding", written over a horizontal line.

McNAIR LAW FIRM, P.A.
Henrietta U. Golding, SC Bar #2173
Lane D. Jefferies, SC Bar #101764
Post Office Box 336
2411 Oak Street, Suite 206
Myrtle Beach, SC 29578
(843) 444-1107
Attorneys for Respondents
Rabon & Rabon, Inc.

Myrtle Beach, South Carolina
Date: November 23, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No.: 2014-CP-26-07862
Appellate No.: 2016-000522

RECEIVED

NOV 28 2016

SC Court of Appeals
Appellants,

Karon Mitchell and Kyle Mitchell,.....

vs.

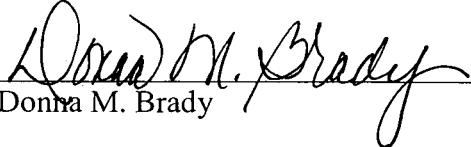
Rabon & Rabon, Inc. Respondent.

PROOF OF SERVICE

I, Donna M. Brady, an employee of McNair Law Firm, P.A., certify that I have served Respondent's Initial Brief, Designation of Matter, Certificate of Counsel, and Proof of Service on all parties to this matter by depositing a copy in the United States Mail, first class postage prepaid on the 23rd day of November, 2016.

Counsel for Appellant of Record:

Tucker S. Player, SC Bar # 16217
Player Law Firm
1415 Broad River Road
Columbia, SC 29210


Donna M. Brady

Myrtle Beach, South Carolina

MCNAIR
ATTORNEYS

Lane D. Jefferies

November 23, 2016

ljefferies@mcnair.net
T (843) 443-3059
F (843) 444-3964

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

RECEIVED

NOV 28 2016

SC Court of Appeals

RE: *Karon Mitchell v. Rabon & Rabon, Inc.*
Appellate Case No.: 2016-000522
Our File No.: 062992.00001

Dear Ms. Kitchings:

With regard to the above matter, enclosed please find a copy of the following:

- Original (unbound) and one copy of the Initial Brief of Respondents Rabon & Rabon, Inc.;
- Original and one copy of the Designation of Matters of Respondents Rabon & Rabon, Inc.; and
- Proof of Service.

By copy of this letter to parties of record, and as shown on the Proof of Service, I hereby serve a copy of the aforementioned documents to the parties of record.

Please return to me one clocked copy of the enclosed documents in the enclosed self-addressed envelope.

Best regards,

McNair Law Firm, P.A.



Lane D. Jefferies

McNair Law Firm, P. A.
Founders Centre
2411 Oak Street, Suite 206
Myrtle Beach, SC 29577

Mailing Address
Post Office Box 336
Myrtle Beach, SC 29578

mcnair.net

LDJ:dmb

Enclosures

cc: Tucker S. Player, Esq. (via email - tucker@playerlawfirm.com)
Clients



RECEIVED

NOV 28 2016

SC Court of Appeals

MCNAIR | McNair Law Firm, P.A.
ATTORNEYS | Post Office Box 336
Myrtle Beach, SC 29578
www.mcnair.net

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

FIRST CLASS MAIL

