

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
DEC 28 2016
SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

2014-CP-23-03197

Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2016-001425

Natasha Turner

Respondent

v.

Michael T. Kellett and Carmen Kellett

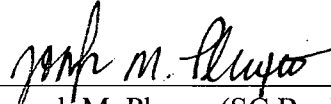
Appellants

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

In addition to the matter designated by the Appellants in their Designation of Matter to Be Included in the Record on Appeal, Respondent proposes the following to be included as well:

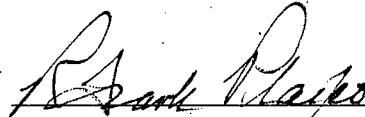
1. Answer, Counterclaim and Crossclaim filed in Court of Common Pleas by Appellant's first attorney
2. Respondents Notice and Motion for Amendment of Order filed January 7, 2016
3. Respondent's Notice of Appeal of the Amended Order issued by Judge Letitia H. Verdin dated June 7, 2016
4. Defendant Carmen Kellett's Deposition Transcript excerpt 18:23 – 20:23, dated March 17, 2015

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



Joseph M. Plaxco (SC Bar No. 100975)
Joseph M. Plaxco, LLC
707 East North Street
Greenville, South Carolina 29601
(864) 240-9112 (telephone)
(864) 232-7707 (facsimile)
joseph.plaxco@plaxcolaw.com

- and -



R. Frank Plaxco (SC Bar No. 4476)
925 Cleveland Street; Unit 59
Greenville, South Carolina 29601
(864) 232-9828 (telephone)
rfplaxco@gmail.com

December 21, 2016

JOSEPH M. PLAXCO, LLC
ATTORNEY AT LAW
707 EAST NORTH STREET
GREENVILLE, SOUTH CAROLINA 29601

RECEIVED

DEC 28 2016

SC Court of Appeals

TELEPHONE: (864) 240-9112
TELEFAX: (864) 232-7707
JOSEPH.PLAXCO@PLAXCOLAW.COM

December 21, 2016

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

**Re: Michael T. Kellett and Carmen Kellett, Appellants, v. Natasha Turner,
Respondent
Appellate Case No. 2016-001425**

Dear Ms. Kitchings,

In connection with the above referenced appeal, please find enclosed Ms. Turner's Designation of Matter to be Included in the Record on Appeal, her Initial Brief, and a Proof of Delivery for the same.

By copy of this letter, I am hereby serving Mr. Clifford Gaddy, attorney for Mr. and Mrs. Kellett, with the same.

Should you have any questions, please let me know.

I hope you have a Merry Christmas and a Happy New Year.

Sincerely,

JOSEPH M. PLAXCO, LLC



Joseph M. Plaxco

JMP
Enclosures
cc: Mr. Clifford F. Gaddy, Jr. (via mail)

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

DEC 28 2016

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

2014-CP-23-03197

Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2016-001425

Natasha Turner

Respondent

v.

Michael T. Kellett and Carmen Kellett

Appellants

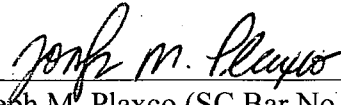
PROOF OF SERVICE BY MAIL

I hereby certify that on the 21st day of December, 2016, I served a copy of the Respondent's Designation of Matter to be Included in the Record on Appeal and Initial Brief on the Appellants, Michael T. Kellett and Carmen Kellett, by mailing it to their attorney of record, Clifford F. Gaddy, Jr., by depositing it in the U.S. mail, in an envelope with sufficient postage affixed, addressed as follows:

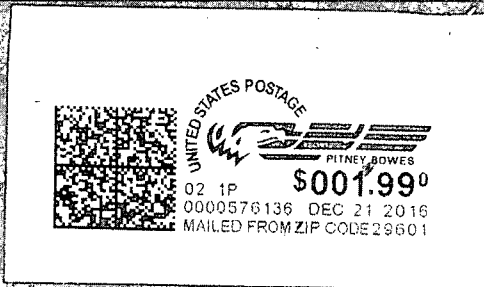
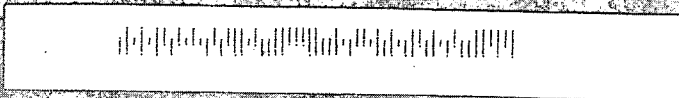
Clifford F. Gaddy, Jr.
408 N. Church St., Suite B
Greenville, SC 29601

I do further certify that on December 21, 2016, I placed a copy of the Respondent's Designation of Matter to be Included in Record of Appeal and the Respondent's Initial Brief in the U.S. mail, with sufficient postage addressed to:

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



Joseph M. Plaxco (SC Bar No. 100975)
707 East North Street
Greenville, South Carolina 29601
(864) 240-9112 (telephone)



JOSEPH M. PLAXCO, LLC
ATTORNEY AT LAW
707 East North Street
Greenville, South Carolina 29601

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