

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2016-002487

RECEIVED

MAR 02 2017

SC Court of Appeals

Cassandra M. Myers and Bartholomew Myers in their capacity as Co-Personal
Representatives of the Estate of E. M. Myers,

Appellants,

v.

The Consolidated Employee Recreation Clubs, a non-profit organization a/k/a
Pine Island Club at Lake Murray; South Carolina Electric and Gas Holding
Company, Inc.; SCANA; and Mandy Nicole Bellamy,

Respondents.

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

Appellants propose the following to be included in the Record on Appeal:

- 1) All pleadings, except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- 2) Answers to all Interrogatories and Request for Production;
- 3) Deposition transcript and exhibits of Mandy Bellamy;
- 4) Affidavits and Supplemental Affidavits of Drs. Francesco Pia and Ralph Johnson;
- 5) E-mail correspondence between the Honorable William P. Keesley and Counsel for both the Plaintiff and the Defendant;
- 6) E-mail correspondence between Plaintiff's counsel and Defendant's counsel;
- 7) All Orders except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;

- 8) All Motions except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- 9) Transcription of the Hearing held on December 11, 2015 before the Honorable William P. Keesley, except those portions, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- 10) Notice of Appeal by Appellants;
- 11) Plaintiffs response to defendants motion for summary judgment ;
- 12) Any other document cited in Appellants' Initial Briefs;
- 13) Plaintiffs response to defendants motion for summary judgment, to the extent that this item was not covered in the initial designation;
- 14) Defendants memoranda in support of motion for summary judgment, to the extent that this item was not covered in the initial designation.

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

GRAHAM LAW FIRM, P.A.
KROMPECHER LAW FIRM, PLLC



Edward L. Graham (SC Bar: 2483)
J. Layton Ruffin (SC Bar: 78267)
Pedro E. Krompecher, III (SC Bar: 100485)
Post Office Box 550
Florence, SC 29501
t. (843) 662-3281
f. (800) 859-7028
Attorneys for Appellants

Other Counsel of Record:
Christian Stegmaier
Megan H. Hall
Collins & Lacy, P.C.
1330 Lady Street
Sixth Floor
Columbia, SC 29201
Attorneys for Respondents

March

1,

2017

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2016-002487

RECEIVED

MAR 02 2017

SC Court of Appeals

Cassandra M. Myers and Bartholomew Myers in their capacity as Co-Personal
Representatives of the Estate of E. M. Myers, Appellants,

v.

The Consolidated Employee Recreation Clubs, a non-profit organization a/k/a
Pine Island Club at Lake Murray; South Carolina Electric and Gas Holding
Company, Inc.; SCANA; and Mandy Nicole Bellamy, Respondents.

PROOF OF SERVICE

I hereby certify that one copy of the *Designation of Matter to be Included in the Record*
in the above-referenced matter was served by U.S. Mail, postage prepaid, on March 1, 2017
addressed to the following counsel of record:

Christian Stegmaier
Megan H. Hall
Collins & Lacy, P.C.
1330 Lady Street
Sixth Floor
Columbia, SC 29201

GRAHAM LAW FIRM, P.A.
KROMPECHER LAW FIRM, PLLC



Edward L. Graham (SC Bar: 2483)
J. Layton Ruffin (SC Bar: 78267)
Pedro E. Krompecher, III (SC Bar: 100485)
Post Office Box 550
Florence, SC 29501
t. (843) 662-3281
f. (800) 859-7028

Attorneys for Appellant



GRAHAM LAW

Shining a Light on Safety, Guiding the Way to Justice.

Edward L. Graham
Diane M. Rodriguez, RN-JD
J. Layton Ruffin

RECEIVED

March 1, 2017

MAR 02 2017

SC Court of Appeals

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

Re: *Cassandra M. Myers and Bartholomew Myers in their capacity as Co-Personal Representatives of the Estate of Evan Morris Myers, Appellants, v. The Consolidated Employee Recreation Clubs, a non-profit organization a/k/a Pine Island Club at Lake Murray; South Carolina Electric and Gas Holding Company, Inc.; SCANA, Respondents.*
Appellate Case No. 2016-002487

Dear Ms. Kitchings:

Enclosed for filing is the *Appellants' Response To Respondent's Motion To Strike and Supplemental Designation of Matter to be Included in the Record on Appeal* in the above case. By copy of this letter, I am serving attorneys for Respondents with a copy of the same. Please return a clocked copy to me using the enclosed self-addressed, stamped envelope.

Thank you for your attention to this matter.

Very truly yours,

J. Layton Ruffin

JLR/bh

Enclosures

cc: Christian Stegmaier
Megan H. Hall

UNITED STATES POSTAGE
PITNEY BOWES
02 1P \$ 001.82⁰
0001605514 MAR 01 2017
MAILED FROM ZIP CODE 29501



GRAHAM LAW

GRAHAM LAW FIRM, P.A.
383 West Cheves Street
P.O. Box 550 (29503)
Florence, SC 29501

RECEIVED

MAR 02 2017

SC Court of Appeals

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

RECEIVED

MAR 02 2017

SC Court of Appeals