

RECEIVED

MAR 10 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

Appellate Case No. 2016-000227
Case No. 2013-CP-42-03915

Angie Keene, Individually and as
Personal Representative of the Estate of
Dennis Seay, Deceased, and Linda Seay, Respondents,

v.

CNA Holdings, LLC, Appellant.

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

Respondents propose the following be included in the Record on Appeal:

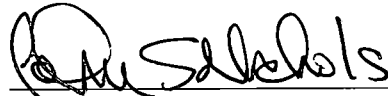
1. Order granting Plaintiffs' motion to amend complaint of 4/24/15;
2. Order denying Defendant CNA Holdings' motion to dismiss 7/28/15;
3. Order denying Defendant CNA Holdings' post-trial motions filed 1/13/16;
4. Complaint;
5. Plaintiffs' response in opposition to Defendant CNA Holdings, LLC's supplemental and amended motion to dismiss for failure to state a claim, or in the alternative, motion for summary judgment based on the statutory employee doctrine (without exhibits);
6. Plaintiffs' response to CNA Holdings' surreply in support of its supplemental and amended motion to dismiss for failure to state a claim, or in the alternative, motion for summary judgment based on the statutory employee doctrine (with exhibits);
7. CNA Holdings' motion for new trial absolute;
8. Plaintiffs' memo in opposition to motion for new trial absolute;
9. CNA Holdings' reply in support of motion for new trial absolute;
10. Plaintiffs' master exhibits to post-trial motions pp. 432-438, 449, 450, 453, 456, 499, 545-555, 670;
11. Motions Hearing Transcript of 7/27/15;
12. Trial Transcript of 9/28/15-10/8/15;

13. Post-trial Motions Hearing Transcript of 12/3/15.

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

March 10, 2017

Respectfully Submitted,



Blake A. Hewitt, SC Bar #73674

John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorneys for Respondents

RECEIVED

MAR 10 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge

Appellate Case No. 2016-000227
Case No. 2013-CP-42-03915

Angie Keene, Individually and as
Personal Representative of the Estate of
Dennis Seay, Deceased, and Linda Seay, Respondents,

v.

CNA Holdings, LLC, Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Appellant with a copy of the *Initial Brief of Respondents and Designation
of Matter to be Included in the Record on Appeal* by mailing copies of the same by
United States Mail with first class postage prepaid to the following address:

C. Mitchell Brown
A. Mattison Bogan
Michael J. Anzelmo
Blake T. Williams
Nelson Mullins Riley & Scarborough, LLP
PO Box 11070
Columbia, SC 29211


Erin Bridges

March 10, 2017