

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master in Equity
The Honorable Mikell R. Scarborough

Case No. 2013-CP-10-3901
Appellate Case No. 2016-001842

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SC Court of Appeals

Charleston Electrical Services, Inc., and Selective
Insurance Company of South Carolina, as subrogee
of Charleston Electrical Services, Inc. Appellants,

v.

Wanda G. Rahall, Respondent.

**DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL OF RESPONDENT WANDA G. RAHALL**

PRITCHARD LAW GROUP, LLC
Edward K. Pritchard, III, Esquire
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ATTORNEYS FOR RESPONDENT

April 14, 2017
Charleston, South Carolina

PLEASE TAKE NOTICE, that Respondent, Wanda G. Rahall, hereby proposes the following matter to be included in the Record on Appeal in this case:

1. *Order Entering Judgment in Favor of Defendant, Wanda G. Rahall*, dated July 16, 2016, and filed August 2, 2016
2. *Consent Order of Reference*, dated January 27, 2015, and filed February 3, 2015
3. *Summons and Complaint* dated July 2, 2013, and filed July 3, 2013.
4. *Answer*, dated September 13, 2013, and filed September 13, 2013
5. *Amended Complaint*, dated January 7, 2015, and filed January 12, 2015
6. *Answer to Amended Complaint*, dated February 3, 2015, and filed February 5, 2015
7. *Amended Answer to Amended Complaint*, dated February 9, 2015, and filed February 11, 2015
8. Trial Transcript, June 17, 2016, pp.1-68
9. Joint Stipulation of Facts with Exhibits
10. Deposition of John M. Oakley, with exhibits, given November 16, 2011
11. Deposition of George Kornahrens, with exhibits, given November 16, 2011
12. Deposition of Wanda G. Rahall given November 16, 2011
13. Deposition of Wanda G. Rahall given May 26, 2016

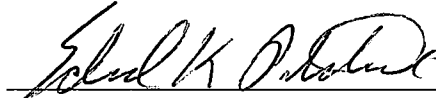
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CERTIFICATE OF COUNSEL

The undersigned hereby certifies that the Designation of Matter to be Included in the Record on Appeal of Respondent Wanda G. Rahall, contains no matter which is irrelevant to the appeal of this action.

Signature Page to Follow

PRITCHARD LAW GROUP, LLC



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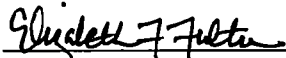
v.

Wanda G. Rahall,Respondent.

PROOF OF SERVICE

I certify that I have served *Respondent's Initial Brief and Designation of Matter to be included on the Record on Appeal of Respondent Wanda G. Rahall* on Appellants Charleston Electrical Services, Inc. and Selective Insurance Company of South Carolina as Subrogee of Charleston Electrical Services, Inc., by depositing a copy of it in the United States Mail, postage prepaid, to their attorney of record, Andrew F. Lindemann, Esquire, at his office at 1611 Devonshire Drive, Post Office Box 8568, Columbia, South Carolina 29202 on April 17, 2017.

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April 17, 2017

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VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
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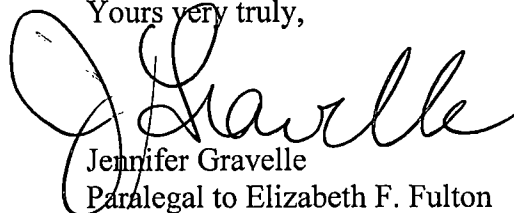
RE: Charleston Electrical Services, Inc. v. Rahall
Appellate Case No. 2016-001842

Dear Ms. Kitchings:

Please find enclosed an original and seven (7) copies of *Initial Brief of Respondent* in connection with the above-referenced matter. I would appreciate you returning a clocked copy of the brief in the enclosed self-addressed postage prepaid envelope, I have provided. Should you have in questions, please do not hesitate to contact me.

With warmest personal regards, I am

Yours very truly,


Jennifer Gravelle
Paralegal to Elizabeth F. Fulton

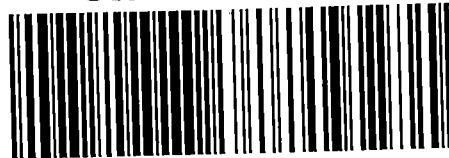
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Enclosures

cc: Andrew F. Lindemann, Esq.



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