

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

APR 27 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.

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

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

- 1) The following pleadings:

Amended Complaint
Answers to Plaintiffs' Interrogatories to Defendants
Answers to Plaintiffs' Second Interrogatories to Defendants;

- 2) The following portions of the Deposition transcript and exhibits of Mandy Bellamy:

Bellamy Depo. 44:9-16
Bellamy Depo. 48:17-19
Bellamy Depo. 53:10-15
Bellamy Depo. 56:11 to 57:8
Bellamy Depo. 69:24-25, 71:22 to 72:2
Bellamy Depo. 74:7-10
Bellamy Depo 81:1-9
Bellamy Depo. 92:13-19, 93:7-13
Bellamy Depo. 96:25 to 97:24
Bellamy Depo 149:15-150:1;

- 3) Affidavits and Supplemental Affidavits of Drs. Francesco Pia and Ralph Johnson;
- 4) E-mail correspondence between the Honorable William P. Keesley and Counsel for both the Plaintiff and the Defendant;

- 5) The following Orders:

Order (August 24, 2016)
Order denying motion to alter or amend (November 15, 2016)
Order Granting Summary Judgment
Reply to Defendants' Response (October 10, 2016)
Response to Defendant's Motion for Summary Judgment
(December 8, 2015);

- 6) The following Motions, and responses to motions:

Defendant's Motion for Summary Judgment (November 3, 2014)
Memo in Opposition to Motion to Alter or Amend (September 27,
2016)
Motion to Alter or Amend and Supp. Affs. of Drs. Pia and
Johnson;

- 7) Transcription of the Hearing held on December 11, 2015 before the Honorable William P. Keesley:

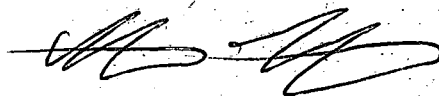
- 8) Appellants Notice of Appeal and Amended Notice of Appeal;

- 9) The following documents cited in Appellants' Initial Briefs:

Consolidated Employee Recreation Clubs Bylaws Art. V.
Pine Island Chapter Bylaws Art. V
Statement of Evan McPherson
Statement of J.W. Seay

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

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



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J. Layton Ruffin (SC Bar: 78267)
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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

April 26, 2017

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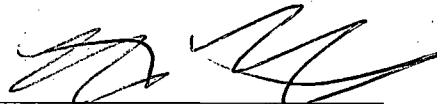
Respondents.

PROOF OF SERVICE

I hereby certify that one copy of the *Amended Designation of Matter to be Included in the Record* in the above-referenced matter was served by U.S. Mail, postage prepaid, on April 26, 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

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Attorneys for Appellant



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

Edward L. Graham
Diane M. Rodriguez
J. Layton Ruffin

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Megan H. Hall
Collins & Lacy, P.C.
1330 Lady Street
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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. Hall:

Enclosed is the Appellants' Amended Designation of Matter to be Included in the Record on Appeal in the above case, which I hereby serve upon you.

Very truly yours,

J. Layton Ruffin
Pedro Krompecher
PK/jd
Enclosures
cc: The Honorable Jenny Abbott Kitchings

GRAHAM LAW FIRM, P.A.

383 West Cheves Street, Florence. SC 29501

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Dear Mr. Stegmaier:

Enclosed is the Appellants' Amended Designation of Matter to be Included in the Record on Appeal in the above case, which I hereby serve upon you.

Very truly yours,

J. Layton Ruffin
Pedro Krompecher
PK/jd
Enclosures
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Dear Ms. Kitchings:

Enclosed for filing is the Appellants' Amended 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
Pedro Krompecher
PK/jd
Enclosures
cc: Christian Stegmaier
Megan H. Hall

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