

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM MARION COUNTY
COURT OF COMMON PLEAS
THE HONORABLE THOMAS A. RUSSO
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2017-000210
CIVIL ACTION NO. 2015-CP-33-140

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AUG 08 2017

SC Court of Appeals

Vanessa Blackwell, a/k/a
Jacqueline Blackwell,

RESPONDENT,

versus

Andrew J. Herring, Individually, and as an
employee/agent of Marion County Sheriff's
Department; and Marion County Sheriff's Department,

DEFENDANTS,

Of which Marion County Sheriff's Department is the

APPELLANT.

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

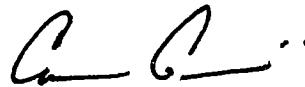
The Marion County Sheriff's Department, Appellant in the above referenced matter, proposes the following be included in the Record on Appeal:

1. Complaint, filed February 19, 2015;
2. Answer, filed May 4, 2015;
3. Motion to Dismiss, filed May 4, 2015;
4. Motion to Strike Punitive Damages, filed May 4, 2015;
5. Consent Orders dismissing Herring and striking punitive damages, filed August 6, 2015;

6. Trial Transcript of trial held on September 12, 2016 before The Honorable Thomas A. Russo (designated pages only): pp. 1-21, 30-31, 40, 65-122, 125-136, 141-175, 180-212, 222-226, 243-314, 320-351, 353-354, and 359-363;
7. Verdict Form;
8. Motion for Judgment Notwithstanding the Verdict, or in the Alternative, a New Trial, filed September 23, 2016;
9. Form 4 and Order Denying Post-Trial Motions, filed January 18, 2017;
10. Defendant's Exs. 1, 3, 4, 5, 6, 7, 8, and 9;
11. Plaintiff's Exs. 6 and 7; and
12. Court's Ex. 1 (Voir Dire Requests).

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

Respectfully submitted,



Douglas C. Baxter
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Carmen V. Ganjehsani
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**ATTORNEYS FOR APPELLANT
MARION COUNTY SHERIFF'S
DEPARTMENT**

August 7, 2017.

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Appellant, Marion County Sheriff's Department, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated August 7, 2017, by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the parties indicated below:

Eric M. Poulin
Roy T. Willey, IV
ANASTOPOULO LAW FIRM, LLC
62 Columbus Street
Charleston, SC 29403
ATTORNEYS FOR RESPONDENT



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RICHARDSON, PLOWDEN & ROBINSON, PA
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**ATTORNEYS FOR APPELLANT
MARION COUNTY SHERIFF'S
DEPARTMENT**

Dated: August 7, 2017.

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Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

August 7, 2017

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Re: *Blackwell v. Marion County Sheriff's Department*
Appellate Case No.: 2017-000210
Case No.: 2015-CP-33-140
RPR File No.: 149-211

Dear Ms. Kitchings:

Enclosed for filing are the original Initial Brief of Appellant, Marion County Sheriff's Department, and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our original Certificates of Service.

By copy of this letter, we are this day serving a copy of our Initial Brief and Designation of Matter on counsel for the Respondent.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,

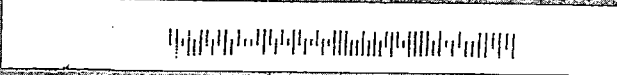


Carmen V. Ganjehsani

CVG/lmi
Enclosures

cc: Eric M. Poulin, Esquire
Roy T. Willey, IV, Esquire
Douglas C. Baxter (FYI)

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149-211

RICHARDSON
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The Honorable Jenny Abbott Kitchings
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