

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

Thomas A. Russo Circuit Court Judge

RECEIVED

OCT 10 2017

SC Court of Appeals

Appellate Case No. 2017-000210
Civil Action No. 2010-CP-08-3732

Vanessa Blackwell a/k/a
Jacqueline Blackwell,..... Respondent,

v.

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.

RESPONDENT'S DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Respondent proposes the following be included in the Record on Appeal:

1. Complaint, filed February 19, 2015;
2. Answer, filed May 4, 2015;
3. Transcript of trial beginning September 12, 2016, designated pages:

1-21
30-43
84-122
125-136

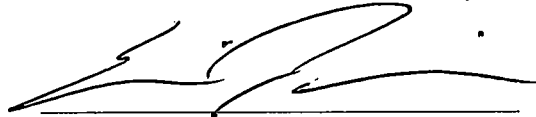
141-174
180-212
222-226
242-314
347
353-354

4. Plaintiff's Trial Exhibits 4, 5, 6, and 7;
5. Defendant's Trial Exhibit 1;
6. Verdict Form;
7. Defendant's Post Trial Motions filed September 23, 2016;
8. Plaintiff's Memorandum in Opposition to Post Trial Motions filed September 28, 2016;
9. Order Denying Post Trial Motions filed January 18, 2017.

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

Respectfully Submitted,

ANASTOPOULO LAW FIRM, LLC

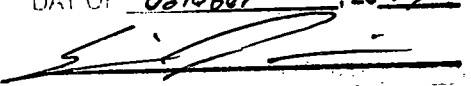


Eric M. Poulin
S.C. Bar No.: 100209
Roy T. Willey, IV
S.C. Bar No.: 101010
Anastopoulos Law Firm, LLC
62 Columbus Street
Charleston, SC 29403
(843) 614-8888

Attorneys for Respondent

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES
THAT I HAVE FILED A COPY OF THE
PREVIOUSLY REFERENCED PAPERS ON
ALL OF THE ABOVE CASES ON THIS 6th
DAY OF October, 2017.



October 6, 2017

TOLL FREE: 1(800) 313-2546
FACSIMILE: (843) 494-5536

REPLY TO COLUMBUS STREET OFFICE
ERIC@AKIMLAWFIRM.COM

ANASTOPOULO

LAW FIRM

AKIM A. ANASTOPOULO (SC)

JONATHAN N. ALKIS (SC)
CONSTANCE ANASTOPOULO (SC)*
NADIA S. BAIG (SC)(FL)
GARRETT L. BROWN (SC)
BRITTANY A. DUNNE (CT)
STEFAN B. FEIDLER (SC)
HERB F. GLASS (SC)
J. CAMDEN HODGE (SC)
THOMAS D. KANDLER, II (NC)
BYRON V. LEARY, II (SC)
MATTHEW L. NALL (SC)
ERIC M. POULIN (SC)(NC)(GA)(CA)
SAMANTHA SUTTON (SC)(NC)
SEAN M. TROPEA (SC)
CASEY VAN VALKENBURGH (SC)(IL)
P. HEATH WARD (SC)
DANNY LEE WILLARD, JR. (SC)
ROY T. WILLEY, IV (SC)
CRAYTON WILLIAMS (SC)

*OF COUNSEL

October 06, 2017

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

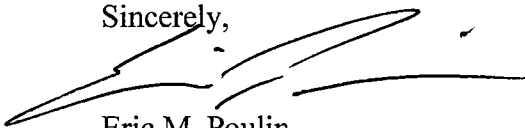
RE: *Jacqueline Blackwell v. Marion County Sheriff's Department*
Appellate Case No.: 2017-000210

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy each of Respondent's Initial Brief and Respondent's Designation of Matter to be Included in the Record on Appeal. We would appreciate it if you would file the originals and return the stamped copies through the provided envelope..

By copy of this letter, I am serving the same upon counsel for Appellant. If you should have any questions, please do not hesitate to contact us.

Sincerely,



Eric M. Poulin

Enclosure

Cc: Carmen Ganjehsani
Cc: Douglas C. Baxter

RECEIVED

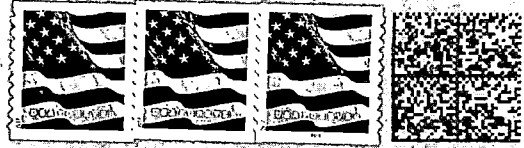
OCT 10 2017

SC Court of Appeals

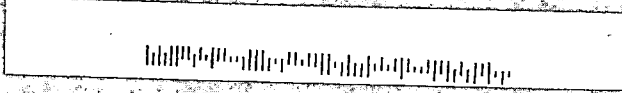
MAILING: 62 Columbus Street, Charleston, South Carolina 29403

North Charleston: 2557 Ashley Phosphate Road, North Charleston, South Carolina 29418 * **Florence:** 150 W. Evans Street, Florence, South Carolina 29501
Columbia: 1201 Main Street, Suite 1901, Columbia, South Carolina 29201 * **Myrtle Beach:** 2411 N. Oak Street, Suite 305, Myrtle Beach, South Carolina 29577
Greenville: 220 North Main St., Suite 500, Greenville, SC 29601 * **Wilmington, NC:** Appointment Only

Eric M. Poulin
Anastopoulo Law Firm, LLC
62 Columbus Street
Charleston, SC 29403



US POSTAGE
\$ 02.03
Mailed From 29403
10/06/2017
031A 0004191602



Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
OCT 10 2017
SC Court of Appeals