

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 19 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
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62 Columbus Street
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Attorneys for Respondent

17
October 6, 2017

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

Thomas A. Russo Circuit Court Judge

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Of which, Marion County Sheriff's Department is the.....Appellant.

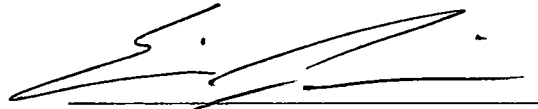
CERTIFICATE OF SERVICE

I certify that on October 6, 2017, I placed Respondent's Initial Brief and Designation of Matter in the United States First Class Mail with sufficient postage and addressed to the Court and opposing counsel. I subsequently learned that the Court did not receive my package. However, opposing counsel confirmed that she did receive the package addressed to her. Accordingly, I certify that I have placed a second copy of the documents in the mail this 17th day of October, 2017, again addressed to the Court and opposing counsel.

[signature on following page]

Respectfully Submitted,

ANASTOPOULO LAW FIRM, LLC



Eric M. Poulin

S.C. Bar No.: 100209

Roy T. Willey, IV

S.C. Bar No.: 101010

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17
October 8, 2017

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ANASTOPOULO

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*OF COUNSEL

October 17, 2017

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

RECEIVED
OCT 19 2017
SC Court of Appeals

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

Dear Ms. Kitchings:

I am in receipt of your letter dated October 12, 2017 indicating that the Court did not receive Respondent's Initial Brief or Designation of Matter. The purpose of this letter is to inform the Court that the same was placed in the mail with sufficient postage and addressed to both the Court and opposing counsel on October 6, 2017. I am not sure why the copy to the Court was never delivered. However, I have enclosed an e-mail from opposing counsel indicating that she received the copy that was addressed to her.

I am enclosing again for filing an original and one copy each of Respondent's Initial Brief and Respondent's Designation of Matter to be Included in the Record on Appeal. I have also generated a new Certificate of Service attesting to the facts set forth above. We would appreciate it if you would file the originals and return the stamped copies through the provided envelope.

Please do not hesitate to contact me should you require anything further.

Sincerely,



Eric M. Poulin

Enclosure

Cc: Carmen Ganjehsani
Cc: Douglas C. Baxter

MAILING: 62 Columbus Street, Charleston, South Carolina 29403

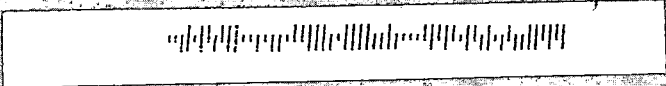
North Charleston: 2557 Ashley Phosphate Road, North Charleston, South Carolina 29418 * **Florence:** 150 W. Evans Street, Florence, South Carolina 29501
Columbia: 1201 Main Street, Suite 1901, Columbia, South Carolina 29201 * **Myrtle Beach:** 2411 N. Oak Street, Suite 305, Myrtle Beach, South Carolina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

Eric M. Poulin
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SC Court of Appeals

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