

THE STATE OF SOUTH CAROLINA
In the Court of Appeals
APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Carmen T. Mullen
Circuit Court Judge

RECEIVED
OCT 27 2017
SC Court of Appeals

Case No. 2014-CP-07-02268

Appellate Case No. 2017-000685

BARBARA AIMAR GOODWIN, f/k/a BARBARA A. GILLEY Appellant,

vs.

RONALD L. ROSSETTI, Individually, and as Trustee of the RONALD L. ROSSETTI TRUST-1989, LINDA A. ROSSETTI, as Trustee of the RONALD L. ROSSETTI TRUST, the RONALD L. ROSSETTI TRUST, CHRISTOPHER T. GODLEY and JADE GODLEY Defendants.

Of Whom RONALD L. ROSSETTI, Individually, and as Trustee of the RONALD L. ROSSETTI TRUST-1989, LINDA A. ROSSETTI, as Trustee of the RONALD L. ROSSETTI TRUST, the RONALD L. ROSSETTI TRUST, are Respondents.

DESIGNATION OF MATTERS
(To Be Included in the Record on Appeal)


The Appellant submits that the following should be included in the Record on Appeal in this case:

1. Order dated February 9, 2017, as well as the Notice of Appeal therefrom.
2. Motion for Reconsideration dated February 21, 2017.
3. Motion for Reconsideration dated February 23, 2017.
4. Order dated March 27, 2017, as well as the notice of Appeal therefrom.
5. Summons and Complaint dated September 8, 2014, and filed on September 9, 2014.

6. Date stamped letter to the Beaufort County Sheriff's Office (herein "BCSO), as well as the receipt, confirming delivery of the summons and complaint for service on the Defendants on September 9, 2014.
7. Affidavits of Service from the BCSO on file in the Clerk's Office.
8. Acknowledgments of Service by the different Defendants and/or by their counsel on file in the Clerk's Office.
9. The Notice of Appeal, Appearance of Defendant's Counsel and/or Response by Counsel for Beaufort County, Order of Judge Carmen T. Mullen, Motion for Reconsideration filed by the Plaintiffs, the Order ultimately denying that motion, as well as any other substantive matters of record in Case No. 2012-CP-07-03300.
10. The Answer of the Rossetti Defendants.
11. The Answer of the Godley Defendants.
12. The photo album with dated descriptions of events depicted in the photos that were taken, prepared and compiled by Carolyn Sanders, as well as the color enlargements of the photos delivered in discovery.
13. The Plaintiff's Answers to the Interrogatories of the Rossetti Defendants dated July 31, 2015.
14. The Rossetti Defendants' Motion for Summary Judgment.
15. The Rossetti Defendants' Amended Motion for Summary Judgment dated July 29, 2016.
16. The Motion for Summary Judgment of the Godley Defendants.
17. The Affidavit of Default and Motion for Default by the Godley Defendants.
18. The Affidavit of Carolyn P. Sanders dated September 29, 2016.
19. The Affidavit of Wallace Sanders dated September 29, 2016.
20. The Affidavit of Barbara A. Goodwin dated October 3, 2016, and attached Exhibit A.
21. The Affidavit of R.V. Mathison, Jr., dated October 3, 2017.
22. The Plaintiff's Motion to Dismiss the counterclaim of the Godley Defendants.
23. The Plaintiff's Motion to Set Aside the default, if any.

- 24. The Deposition of Barbara A. Goodwin.
- 25. The Deposition of Ronald L. Rossetti.
- 26. The Deposition of Curtis Calvin Watson.
- 27. The Deposition of Christopher T. Godley.
- 28. The deposition of Jade Godley.
- 29. The transcript of the hearing held on January 4, 2017.

Respectfully Submitted,

By: 
Robert V. Mathison, Jr.
S.C. Bar No. 3685
Attorney for the Appellant
Barbara A. Goodwin
MATHISON & MATHISON
Post Office Box 5271
Hilton Head Island, SC 29938
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Email: rmathlaw@aol.com

October 23, 2017

Hilton Head Island, South Carolina.

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Of Whom RONALD L. ROSSETTI, Individually, and as Trustee of the RONALD L. ROSSETTI TRUST-1989, LINDA A. ROSSETTI, as Trustee of the RONALD L. ROSSETTI TRUST, the RONALD L. ROSSETTI TRUST, are Respondents.


PROOF OF SERVICE

I, Robert V. Mathison, Jr., hereby certify that, on October 24, 2017, I filed and served by mail the original and copies of the Appellant's Motion to Extend Time and/or to Permit Late Filing, as well as the Appellant's Designation of Matter to be Included in the Record by depositing same, with sufficient first class postage prepaid, at the United States Post Office at Asheville, North Carolina, addressed as follows:

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

William A. Bryan, Jr., Esquire
Collins & Lacy, PC
11945 Grandhaven Drive, Suite D
Murrells Inlet, South Carolina 29576

George H. O'Kelley, Jr., Esquire
Attorney at Law
Post Office Box 1072
Beaufort, South Carolina 29901

By: 
Robert V. Mathison, Jr.
S.C. Bar No. 3685
Attorney for the Appellant
Barbara A. Goodwin

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October 24, 2017.

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The Honorable Jenny Abbott Kitchings
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Re: Barbara Aimar Goodwin, etc. v. Ronald L. Rossetti, et al.
Case No. 2014-CP-07-02268
Appellate Case No. 2017-000685

Dear Ms. Kitchings:

Enclosed for filing in this case are the following items:

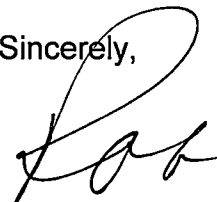
1. The original and six copies of a Motion to Extend Time and/or to Permit Late Filing with respect to the Appellant's Initial Brief;
2. The original and six copies of the Affidavit of R.V. Mathison, Jr., in support of both motions; and
3. The original Proof of Service for each of the foregoing documents.

Also enclosed is my check in the amount of \$25.00 to pay the motion filing fees.

In addition, I have enclosed the Plaintiff's Designation of Matter to be included in the Record on Appeal, as it was completed on time. The Proof of Service covers that document as well.

With kind regards, I am

Sincerely,



Robert V. Mathison, Jr.
S.C. Bar No. 3685

cc: George H. O'Kelley, Jr. Esquire
William A. Bryan, Jr., Esquire
Mrs. Barbara A. Goodwin

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