

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

Appeal from Charleston County
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2016-CP-10-4112

Jane Doe, an adult woman over the age of 18,

Respondent,

v.

TCSC, LLC, d/b/a Hendrick Toyota of North Charleston,

Appellant.

APPELLANT'S DESIGNATION OF MATTER

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Edward D. Buckley, Jr. (SC Bar No. 994)
Nicholas J. Rivera (SC Bar No. 77186)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

*Counsel for Appellant
TCSC, LLC, d/b/a Hendrick Toyota of
North Charleston*

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OCT 30 2017

SC Court of Appeals

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

The Appellant proposes the following to be included in the Record on Appeal:

Orders, Judgments, Decrees, or Decisions

1. Form 4 Order filed April 5, 2017;
2. Order filed April 27, 2017;

Pleadings

3. Summons;
4. Complaint;
5. Answer;

Transcripts

Hearings

6. Transcript from Feb. 22, 2017;
7. Transcript from April 4, 2017;

Other Material or Documents

Motions, Memoranda, and Discovery Responses

8. Defendant's Motion to Compel Arbitration, with exhibits;
9. Defendant's Memorandum in Support of Motion to Compel Arbitration;
10. Plaintiff's Supplemental Memorandum in Opposition to Motion to Compel Arbitration; and

Documents

11. Affidavit of Jane Doe, with exhibits.

I certify that this Designation of Matters contains no matter which is irrelevant to this appeal.

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)
Edward D. Buckley, Jr. (SC Bar No. 994)
Nicholas J. Rivera (SC Bar No. 77186)
Russell G. Hines (SC Bar No. 72100)
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Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

*Counsel for Appellant
TCSC, LLC, d/b/a Hendrick Toyota of
North Charleston*

Charleston, South Carolina

Dated: 10/27/17

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PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP

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25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

Counsel for Appellant

*TCSC, LLC, d/b/a Hendrick Toyota of
North Charleston*

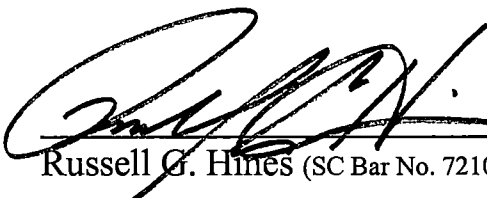
I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellant, hereby certify that the foregoing **INITIAL BRIEF OF APPELLANT** and the **APPELLANT'S DESIGNATION OF MATTER** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on October 27, 2017, properly posted for delivery to the following addressees:

THE MASON LAW FIRM, P.A.
Tidewatch Centre on Shem Creek
Mark A. Mason, Esquire
Anthony E. Forsberg, Esquire
465 West Coleman Boulevard, Suite 302
Mount Pleasant, South Carolina 29464

Counsel for Respondent
Jane Doe, an adult woman over the age of 18

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: _____

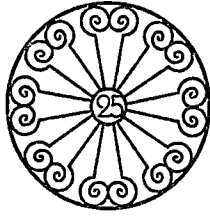


Russell G. Hines (SC Bar No. 72100)

Counsel for Appellant
TCSC, LLC, d/b/a Hendrick Toyota of
North Charleston

Charleston, South Carolina

Dated: 10/27/17



YCR LAW

Russell G. Hines
Partner

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1327
E-mail: RHines@ycrlaw.com

October 27, 2017

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: Jane Doe vs. TCSC, LLC d/b/a Hendrick Toyota of North Charleston
Appellate Case No. 2017-001216
Case No.: 2016-CP-10-4112
Claim No.: 30166435427-0001
Date of Loss: 1/19/2016
YCR File: 11176-20160726

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and one copy of the Initial Brief of Appellant, Appellant's Designation of Matter, and Proof of Service regarding the same.

Kindly return one court-stamped copy in the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Russell G. Hines
Partner

RGH/amj

cc: Mark A. Mason, Esquire, The Mason Law Firm, P.A.
Anthony E. Forsberg, Esquire, The Mason Law Firm, P.A.

FIRST CLASS MAIL



YCRLAW

25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402-0993

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Jenny Abbott Kitchings, Clerk of
Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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