

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED  
DEC 04 2017  
SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable R. Scott Sprouse, Circuit Court Judge

Case No. 2017-CP-23-03402  
Appellate Case No. 2017-002259

Casey Masters ..... Respondent,

v.

KOL, Inc. d/b/a Kia of Greenville ..... Appellant.

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

Appellant KOL, Inc. proposes the following matter to be included in the Record on Appeal:

1. Complaint dated May 25, 2017
2. Kia of Greenville’s Motion to Stay and Compel Arbitration dated July 26, 2017, including Exhibit A – April 10, 2017 Arbitration Agreement, Exhibit B – June 2, 2017 Arbitration Agreement, and Exhibit C – Affidavit of Richard Canova
3. Kia of Greenville’s Memorandum in Support of Motion to Stay and Compel Arbitration dated August 18, 2017 including Exhibit A – April 10, 2017 Arbitration Agreement, Exhibit B – June 2, 2017 Arbitration Agreement and Exhibit C – Affidavit of Richard Canova
4. Kia of Greenville’s Supplemental Memorandum in Support of its Motion to Stay and Compel Arbitration dated August 22, 2017 including Exhibit A – April 10, 2017 Purchase Order, Exhibit B – April 10, 2017 Arbitration Agreement, Exhibit C – June 2, 2017 Arbitration Agreement, Exhibit D –

June 2, 2017 Purchase Order, and Exhibit E – Arbitration Policies and Procedures

5. Letter to Clerk dated August 23, 2017 and Exhibit A to Kia of Greenville’s Supplemental Memorandum – April 10, 2017 Purchase Order
6. Affidavit of Casey Masters filed August 23, 2017
7. Order Denying Defendant’s Motion to Compel Arbitration dated October 12, 2017
8. Kia of Greenville’s Motion to Alter or Amend dated October 17, 2017
9. Order Denying Defendant’s Motion for Reconsideration dated October 25, 2017
10. Transcript of Hearing dated August 23, 2017

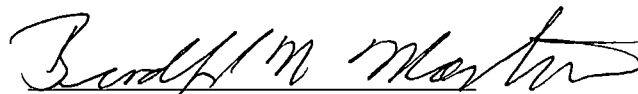
**RECEIVED**  
DEC 04 2017  
SC Court of Appeals

**Certificate of Counsel**

---

The undersigned hereby certifies that this designation contains no matter which is irrelevant to this appeal.

December 1, 2017



Bradford M. Martin, Esq. SC Bar #3658  
Bradford Neal Martin & Associates, PA  
Post Office Box 10410  
Greenville, South Carolina 29603  
(864) 552-9990  
Attorneys for Appellant

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

---

Case No. 2017-CP-23-3402  
Appellate Case No. 2017-002259

---

**RECEIVED**  
DEC 04 2017  
SC Court of Appeals

KOL, Inc., d/b/a Kia of Greenville ..... Appellant,

v.

Casey Masters ..... Respondent.

---

**PROOF OF SERVICE**

---

I certify that I have served Appellant's Initial Brief and Appellant's Designation of Matter to be Included in the Record on Appeal by depositing a copy in the U.S. Mail, postage prepaid, on December 1, 2017, addressed to attorney of record, J. J. Andrighetti, Esq., Kehl Culbertson Andrighetti, LLC, 114 Manly Street, Greenville, SC 29601.

December 1, 2017



Bradford N. Martin, Esq. (SC Bar No. 3658)  
Laura W. H. Teer, Esq. (SC Bar No. 16698)  
BRADFORD NEAL MARTIN & ASSOCIATES, P.A.  
Post Office Box 10410  
Greenville, South Carolina 29603  
864.552.9990  
864.552.9992 (facsimile)

# BRADFORD NEAL MARTIN & ASSOCIATES, PA

ATTORNEYS AT LAW

201 WEST MCBEE AVENUE, SUITE 302  
POST OFFICE BOX 10410 (29603)  
GREENVILLE, SOUTH CAROLINA 29601

BMARTIN@BNMLAW.COM  
PHONE: (864) 552-9990  
FAX: (864) 552-9992

December 1, 2017

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

Re: *Casey Masters v. KOL, Inc. d/b/a Kia of Greenville*  
C/A No. 2017-CP-23-03402  
Appellate Case No. 2017-002259

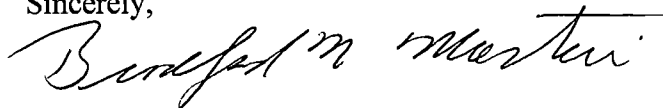
RECEIVED  
DEC 04 2017  
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing is an original and one copy of Appellant's Initial Brief, Appellant's Designation of Matter to Be Included in the Record on Appeal, and a Proof of Service in the above captioned matter. Please file the original with your Court and return a clocked copy to me in the enclosed envelope.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Bradford N. Martin

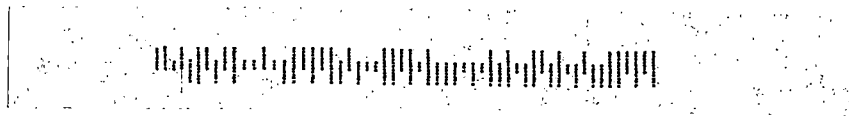
BNM/pm

Enclosures

cc: J.J. Andrighetti, Esq.



# First Class Mail



BRADFORD NEAL MARTIN & ASSOCIATES, PA  
201 WEST MCBEE AVE., SUITE 302  
P.O. BOX 10410 (29603)  
GREENVILLE, SC 29601

TO:

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

**RECEIVED**

DEC 04 2017

SC Court of Appeals