

**FORM 14  
DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III  
Circuit Court Judge, Second Judicial District

Case No. 2015-CP-02-02389

Appellate Case No. 2017-002321

Edward Pugh

Appellant

v.

CB&I AREVA MOX SERVICES, LLC  
and Globalpundits Technology  
Consultancy, LLC

Respondents

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

Plaintiff – Edward Pugh  
Defendants – CB&I AREVA MOX Services, LLC and  
Globalpundits Technology Consultancy, LLC

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

1. Order/Form 4 – Motion for Summary Judgement denied  
as to both parties, Sept. 8, 2016;
2. Order/ Consent for Withdrawal of Counsel, December 16, 2016;

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Event – Motion Hearing January 4, 2017

3. Order/Form 4 - Continue Case 180 Days (& Hear Motion to Enforce on Feb 15, 2017), January 4, 2017;
4. Transcript of Proceedings (CR Ms. Cheri L. Young), Motion Hearing January 4, 2017 pp. 1-9;
5. Defendants – Motion to Enforce Written Agreement, January 4, 2017
6. Defendants - Memorandum in Support of Defs' Motion to Enforce, February 13, 2017
7. Plaintiff - Memorandum to Deny Defendants Motion to Enforce Written Agreement, February 15, 2017
8. Plaintiff - Exhibit A, Defense Proposed Order showing “preliminary agreement”;
9. Plaintiff – Exhibit B, email from Defendant attorney Carrouth to Judge Early;
10. Plaintiff – Exhibit C, Specific Confidential Settlement Information (attorney emails);

Event – Motion Hearing February 15, 2017

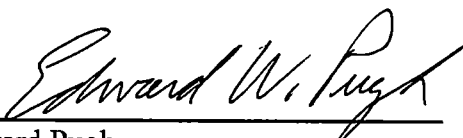
11. Transcript of Proceedings (CR Ms. Bethanie K. Creppon), Motion Hearing from February 15, 2017 pp. 1-13
12. Order/Denying Motion to Enforce Written Agreement, March 2, 2017;
13. Defendants - Motion to Compel Plaintiff to Comply with/Order (March 2, 2017) Enforcing Written Agreement, June 7, 2017;
14. Plaintiff - Motion to Declare Agreement to Settle Null, Void, Non-binding, July 3, 2017;
15. Plaintiff - Motion for Continuance, Case 180 days from 8-21-17, July 3, 2017;
16. Plaintiff - Memorandum to Deny Defense Motion to Enforce and Memo to Support Plaintiff's Motion to Declare Agreement to Settle Null, Void, July 18, 2017;

17. Exhibit A – Defendant’s proposed Order Granting Continuance (previous filing)
  18. Exhibit B – Defendant’s letter to Judge Early via email dated December 16, 2016 presenting the Motion for Continuance;
  19. Exhibit C, Confidential – Three (3) pages of a November 17, 2016 email thread between Plaintiff’s counsel Summerlin and Defense Counsel Christy (Landsdowne) Rogers;
  20. Exhibit D – Jan 4, 2017 Defense Motion to Enforce Written Agreement, page 2
  21. Exhibit E – Four (4) pages of a December 20, 2016 email thread from Plaintiff to Defense counsel and their personnel, Defendants, and Judge Early’s Law Clerk;
  22. Exhibit F, Confidential – Two (2) page letter dated March 15, 2017 from Defense Counsel Carrouth to Plaintiff, with six (6) page attachment of “Settlement Agreement” signed by Plaintiff on November 11, 2016, and Three (3) page Order Denying Defendant’s Motion to Enforce Written Agreement = 11 pages
  23. Exhibit G, Confidential – Signed two (2) page September 30, 2016 “Agreement to Settle”;
  24. Exhibit H – Supreme Court Opinion No. 26120 – 4 pages
  25. Exhibit I – Court of Appeals Opinion No. 3118 – 5 pages
  26. Plaintiff – Coversheet for Sealed Plaintiff’s Exhibits C, F & G, July 18, 2017;
  27. Defendants - Memo in Support of Def Motion to Compel Plt to Comply w/Order, July 20, 2017;
  28. Defendants - Affidavit of Rolland Norton, July 20, 2017;
  29. Defendants - Memo in Opposition, July 20, 2017;
- Event - Motion Hearing July 24, 2017
30. Transcript of Proceedings (CR Ms. Cheri L. Young), Motion Hearing from July 24, 2017 pp.1-21;

31. Email August 10, 2017 from Defense counsel Dudek to Plaintiff Pugh with thread to Judge Early Law Clerk Ms. Hannah Marsh regarding status of Motions from July 24, 2017 Hearing and request to prepare Judge Early an Order, August 10, 2017;
32. Email August 11, 2017 from Defense counsel Dudek to Judge Early Law Clerk Ms. Hannah Marsh with Defendant's proposed Order for Judge Early to Grant Defendant's Motion August 11, 2017
33. Order/Granting Motion to Compel and Motion to Comply August 14, 2017;
34. Plaintiff – Plaintiff's Motion for Reconsideration, August 23, 2017;
35. Defendants - Memo in Opposition, August 24, 2017;
36. Plaintiff - Response to Defense Memo in Opposition, September 1, 2017;
37. Order/Form 4 - Denying Motion/Reconsider, October 11, 2017

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

Monday, January 22, 2018

s/   
 Edward Pugh  
 1085 Old Clemson Hwy., Ste. E  
 Seneca, South Carolina 29672  
 (864) 723-7251  
 Appellant, Pro Se

**PROOF OF SERVICE  
OF FILING THE APPELLANT'S INITIAL BRIEF AND DESIGNATION  
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM AIKEN COUNTY  
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Doyet A. Early, III  
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Case No. 2015-CP-02-02389, Appellate Case No. 2017-002321

Edward Pugh

Appellant

v.

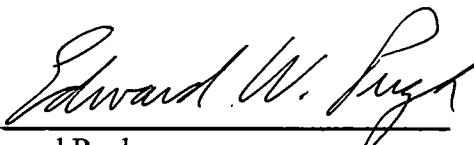
CB&I AREVA MOX SERVICES, LLC  
and Globalpundits Technology  
Consultancy, LLC

Respondents

**PROOF OF SERVICE**

I certify that I have served the **Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal (DOM)** on CB&I AREVA MOX SERVICES, LLC and Globalpundits Technology Consultancy, LLC by depositing a copy of it in the United States Mail, postage prepaid, on January 22, 2018, addressed to their attorneys of record, Michael D. Carrouth and Christina Landsdowne Rogers, Fisher & Phillips, LLP, 1320 Main St., Suite 750, Columbia, South Carolina 29201.

Monday, January 22, 2018

s/   
Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

**LETTER TO THE APPELLATE COURT CLERK  
FILING THE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF  
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Monday January 22, 2018

**VIA Certified U.S. Mail**

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

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JAN 25 2018  
SC Court of Appeals

RE: Filing – Appellant’s Initial Brief and Designation of Matter – Out of Time

Edward Pugh, Appellant vs CB&I AREVA MOX Services LLC, and  
Globalpundits Technology Consultancy, LLC Respondents.

Civil Case No.: 2015-CP-02-02389,                      Appellate Case No. 2017-002321

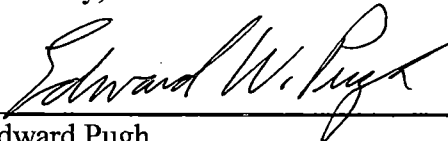
Dear Ms. Kitchings:

Sent by Certified U.S. Mail to the Court for filing is the Appellant’s **Initial Brief and Designation of Matter to be Included in the Record on Appeal** in the above case. I am responding to the Court of Appeals Order of December 19, 2017 that allows an Out-of-Time filing by January 22, 2018. Also sent is the following:

- (1) Proof of Service of the above filing on the Respondents.

If you need anything else or I can otherwise be of any assistance, please feel free to contact me.

Sincerely,

s/ 

Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

cc: Michael D. Carrouth and  
Christina Landsdowne Rogers  
c/o Fisher & Phillips, LLP  
1320 Main St., Suite 750,  
Columbia, South Carolina 29201  
Attorneys for Respondent  
(803) 255-0000

**CERTIFIED MAIL**

Edward W. Pugh  
1085 Old Clemson Hwy, Ste. E  
Seneca, SC  
29672



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JAN 25 2018

SC Court of Appeals

**The Honorable  
Jenny Abbott Kitchings**  
Clerk of Court – Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211