

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

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Appeal from Charleston County  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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Case No. 2016-CP-10-4112

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**RECEIVED**

FEB 09 2018

SC Court of Appeals

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

Respondent,

v.

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

Appellant.

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**RESPONDENT'S DESIGNATION OF MATTER**

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THE MASON LAW FIRM, P.A.  
Anthony E. Forsberg (SC Bar No. 12414)  
Mark A. Mason (SC Bar No. 3676)  
Tidewatch Centre on Shem Creek  
465 West Coleman Boulevard, Suite 302  
Mount Pleasant, South Carolina 29464  
Post Office Box 1271 (29465)  
Telephone: (843) 884-1444

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

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

The Respondent proposes, pursuant to Rule 209 SCACR, the following be included in the Record on Appeal:

Orders, Judgments, Decrees or Decisions

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

Pleadings

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

Transcripts

*Hearings*

6. Transcript of hearing on February 22, 2017;
7. Transcript of hearing on April 4, 2017;

Other Materials 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 Memo in Opposition to Defense Motion to Compel Arbitration;
11. Plaintiff's Supplemental Memo in Opposition to Defense Motion to Compel

Arbitration;

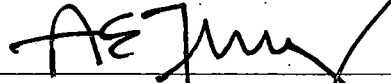
*Documents*

12. Affidavit of Jane Doe, with exhibits.

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

Respectfully submitted,

THE MASON LAW FIRM, P.A.



Anthony E. Forsberg (SC Bar No. 12414)

Mark A. Mason (SC Bar No. 3676)

Tidewatch Centre on Sherrin Creek

465 West Coleman Boulevard, Suite 302

Mount Pleasant, South Carolina 29464

Post Office Box 1271 (29465)

Telephone: (843) 884-1444

Mount Pleasant, South Carolina

Dated: FEBRUARY 2, 2018

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

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PROOF OF SERVICE

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Mark A. Mason (SC Bar No. 3676)  
Tidewatch Centre on Shem Creek  
465 West Coleman Boulevard, Suite 302  
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*Counsel for Respondent Jane Doe,  
an adult woman over the age of 18*

I, Anthony E. Forsberg, of The Mason Law Firm, PA, counsel for Respondent, hereby certify that the foregoing **INITIAL BRIEF OF RESPONDENT** and the **RESPONDENT'S DESIGNATION OF MATTER** were served on all other parties to this matter by depositing a copy of the same in the U.S. mail on February 2, 2018, properly posted for delivery to the following addressees:

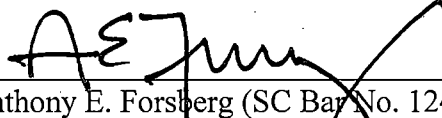
YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown, Esquire  
Edward D. Buckley, Jr., Esquire  
Nicholas J. Rivera, Esquire  
Russell G. Hines, Esquire  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401

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

Respectfully submitted,

THE MASON LAW FIRM, P.A.

By:

  
Anthony E. Forsberg (SC Bar No. 12414)

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

Mount Pleasant, South Carolina  
Dated: FEBRUARY 2, 2018

MARK A. MASON  
ANTHONY E. FORSBERG  
SALAH H. HIBRI  
GABRIELLE Z. LEE (LICENSED IN SC, PA & CO)  
AMANDA D. MCKENDRICK

## THE MASON LAW FIRM, P.A.

TIDEWATCH CENTRE ON SHEM CREEK  
465 W. COLEMAN BOULEVARD, SUITE 302  
POST OFFICE BOX 1271  
MT. PLEASANT, SOUTH CAROLINA 29464

TELEPHONE: (843) 884-1444  
FACSIMILE: (843) 884-3595  
*Reply to Mt. Pleasant Office*  
WWW.MASONLAWFIRM.COM

EDISTO ISLAND OFFICE  
430 S.C. HIGHWAY 174  
EDISTO ISLAND, S.C. 29438  
(843) 869-4000

Writer's e-mail:  
[aforsberg@masonlawfirm.com](mailto:aforsberg@masonlawfirm.com)  
Writer's Direct Dial: (843) 284-6001

February 2, 2018

Jenny Abbott Kitchings, Clerk of Court  
SOUTH CAROLINA COURT OF APPEALS  
Post Office Box 11629  
Columbia, SC 29211

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FEB 09 2018  
SC Court of Appeals

**RE: Jane Doe v. TCSC, LLC d/b/a Rick Hendrick Toyota of North Charleston**

Civil Action Number: 2016-CP-10-4112  
Appellate Case Number: 2017-001216  
MLF File No.: 16-037

Dear Ms. Kitchings:

Enclosed for filing in the above referenced appeal please find the original and two (2) copies of the Initial Brief of Respondent, Respondent's Designation of Matter and Proof of Service relative to this matter.

Assuming you find the same in order, please file the same and return the file stamped copies to my office in the self addressed envelope provided. Of course, if there are any questions, please do not hesitate to call me. Thank you for your assistance in this regard.

With kind professional regards, I am

Yours very truly,

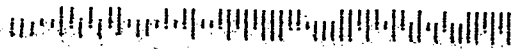
THE MASON LAW FIRM, P.A.


  
Anthony E. Forsberg

AEF/

*Enclosures as stated*

CC: Stephen L. Brown, Esq.  
Edward D. Buckley, Jr., Esq.  
Nicholas J. Rivera, Esq.  
Russell G. Hines, Esq.



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