

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ORANGEBURG COUNTY  
COURT OF COMMON PLEAS

The Honorable R. Knox McMahon,  
The Honorable James B. Jackson, Jr.  
Orangeburg County  
Civil Action No. 2014-CP-38-01590  
Appellate Case No. 2017-000093

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**RECEIVED**

APR 02 2018

**SC Court of Appeals**

Price Oulla and Bonnie Oulla, Appellants,

v.

Lisa Velazques; Harbison Community Association, Inc.; Cody Sox;  
and Patten Seed Company d/b/a Super-Sod,

Of Whom Patten Seed Company d/b/a Super Sod is the Respondent.

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

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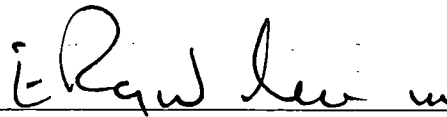
Respondent Patten Seed Company d/b/a Super-Sod proposes the following to be included in the Record on Appeal in addition to the items designated by Appellants:

1. Order Denying Plaintiffs' Motion for Relief from Judgment, July 14, 2017;
2. Order of September 16, 2016;
3. Order Granting Patten Seed Company D/B/A Super Sod's Motion for Summary Judgment, July 26, 2016;
4. Complaint, December 31, 2014;
5. Consent Scheduling Order, January 21, 2016;
6. Motion for Summary Judgment of Harbison Community Association, Inc. and Cody Sox), May 3, 2016;
7. [Super-Sod's] Notice of Motion and Motion for Summary Judgment, May 5, 2016;

8. Consent Scheduling Order, June 10, 2016;
9. Plaintiffs' Memorandum in Opposition to Defendants' Motions for Summary Judgment, June 24, 2016;
10. Plaintiffs' Motion to Amend Complaint, June 29, 2016 and proposed Amended Complaint;
11. Hearing Transcript, June 29, 2016;
12. Haring Transcript, August 23, 2016
13. CAD Call Information; 911 Recordings;
14. Deposition of Lisa Meyers, pp. 32-33, 41-42,
15. Deposition of Cody Sox, pp. 20-22, 30, 33-35, 39, 42, 47, 50-51, 61-63, 69-73, 90-91, 93, 100-101, 104-105, 110-111, 117-118, 124, 128, 132, 136; and
16. Traffic Collision Report Form.

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

Respectfully submitted this 2<sup>nd</sup> Day of April, 2018,



E. Raymond Moore, III, Esquire (SC Bar # 11609)  
Rogers E. Harrell, III, Esquire (SC Bar # 101532)  
Wesley B. Sawyer, Esquire (SC Bar # 100229)  
4406-B Forest Drive  
Post Office Box 6648  
Columbia, South Carolina 29260  
(803) 782-4100, ext. 1235  
(803) 782-4140 (facsimile)

-and-

Mr. Charles H. Williams, Esquire (SC Bar # 6119)  
Williams & Williams  
PO Box 1084  
Orangeburg, SC 29116-1084  
(803) 534-5218  
*Attorneys for Respondent*

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeal

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

The Honorable R. Knox McMahon,  
The Honorable James B. Jackson, Jr.  
Civil Action No. 2014-CP-38-01590  
Appellate Case No. 2017-000093

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SC Court of Appeals

Price Oulla and Bonnie Oulla, ..... Appellants,

v.

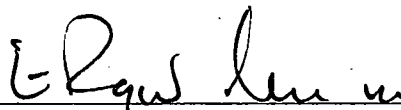
Lisa Velazques; Harbison Community Association, Inc.; Cody Sox; and, Patten Seed  
Company d/b/a Super Sod, ..... Defendants.

Of Whom Patten Seed Company d/b/a Super Sod is the.....Respondent.

**PROOF OF SERVICE**

I certify that I have served the Respondent's Initial Brief and Designation of Matter to be  
Included in the Record on Appeal by depositing a copy of it in the United States Mail, postage  
prepaid, on April 2, 2018, addressed to the attorneys of record, William E. Applegate IV, Esquire  
and David B. Lail, Esquire, 291 East Bay Street, Floor 2, Charleston, SC 29401.

Respectfully submitted,



E. Raymond Moore, Esquire (Bar No. 11609)  
Wesley B. Sawyer, Esquire (Bar No. 100229)  
Rogers E. Harrell, Esquire (Bar No. 101532)  
Murphy & Grantland, P.A.  
P.O. Box 6648  
Columbia, SC 29260  
(803) 782-4100

-and-

Charles H. Williams  
Williams & Williams  
PO Box 1084  
Orangeburg, SC 29116-1084  
(803) 534-5218  
Attorneys for Respondent



MURPHY & GRANTLAND, P.A.

E. Raymond Moore, III  
Direct Dial 803-454-1235  
ermore@murphygrantland.com

April 2, 2018

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SC Court of Appeals

**HAND DELIVERED**

Jenny A. Kitchings  
South Carolina Court of Appeals  
1205 Pendleton Street  
Columbia, SC 29201

RE: Price Oulla and Bonnie Oulla v. Lisa Velazques, Harbison Community Association, Inc. Cody Sox, and Patten Seed Company, d/b/a Super-Sod  
Case No.: 2014-CP-38-01590  
**Appellate Case No.: 2017-000093**  
Date of Loss: July 22, 2014  
Our File No.: 1295-0070

Dear Ms. Kitchings:

Enclosed please find Respondent's Initial Brief, Respondent's Designation of Matter to Be Included in the Record on Appeal, and the Proof of Service in the above-referenced matter. I would appreciate it if you would file the original and return three clocked copies with our courier who hand delivered same.

By copy of this correspondence, I am serving same on opposing counsel of my communication with the Court.

Very truly yours,

E. Raymond Moore, III

ERMIII/hws

Enclosures

cc: William E. Applegate, IV  
David B. Lail