

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

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Case No. 2015-CP-07-00913  
Appellate Case No. 2017-002019

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**RECEIVED**  
APR 16 2018  
SC Court of Appeals

In the matter of the Estate of John Joseph Manning, Jr.

Deanna Bushman, as Holder of Durable Power of  
Attorney for Sally Manning and as a Trustee of the  
Trust Agreement of Sally Manning Dated December 6, 2004 . . . . . Respondent,

v.

The Estate of John J. Manning, Jr.; John J. Manning, III;  
Christopher Manning, and Linda Manning, . . . . . Appellants.

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

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

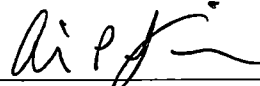
1. Plaintiff's Summary Judgment Memo with exhibits A, C, D, E, and H;
2. Defendants' Summary Judgement Memo.

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

/Signature page attached

Respectfully submitted,

April 16, 2018

 on behalf of and with permission  
of  
Blake A. Hewitt # 73674  
BLUESTEIN THOMPSON SULLIVAN, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202  
(803) 779-7599  
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Attorney for Respondent

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**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellants with a copy of the *Motion for the Court to Accept the Respondent's Initial Brief out of Time* and the conditionally filed *Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Stephen P. Groves, Sr.  
R. Bruce Wallace  
Nexsen Pruet, LLC  
205 King Street, Suite 400  
Charleston, SC 29401

  
Erin Bridges

April 16, 2018

April 16, 2018

VIA HAND DELIVERY

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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APR 16 2018  
SC Court of Appeals

Re: Deanna Bushman v. Estate of John Joseph Manning, Jr.  
Case Tracking No. 2017-002019

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a Motion for the Court to Accept the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal Out of Time. Also, please find enclosed the conditionally filed original and one (1) copy of the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal. I have also enclosed a proof of service upon counsel for the Appellants and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges  
Paralegal to Blake A. Hewitt  
Bluestein Thompson Sullivan, LLC

/emb  
Enclosures

cc: J. Ashley Twombly, Esquire  
Stephen P. Groves, Sr., Esquire  
R. Bruce Wallace, Esquire