

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

Case Tracking No. 2018-000171

**RECEIVED**  
JUN 04 2018  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY COURT OF COMMON PLEAS  
Civil Action No. 2017-CP-10-02148  
J. C. Nicholson, Jr., Circuit Court Judge

Cleo Sanders .....Respondent

v.

Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick  
Dodge Chrysler Jeep Ram, Santander Consumer USA Holdings, Inc., Isiah S. White,  
Danny Anderson and Patrick Bachrodt, Jr..... Defendants

Of whom, Savannah Highway Automotive Company, a General Partnership d/b/a Rick  
Hendrick Dodge Chrysler Jeep Ram and Isiah S. White are the ..... Appellants

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**ADESIGNATION OF MATTER TO BE  
INCLUDED IN RECORD ON APPEAL OF APPELLANTS**

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John T. Lay, Jr.  
Jessica A. Waller  
Alice P. Adams  
GALLIVAN, WHITE & BOYD, P.A.  
Post Office Box 7368  
Columbia, SC 29202  
(803) 779-1833

*Attorneys for Appellants Savannah Highway  
Automotive Company, a General Partnership  
d/b/a Rick Hendrick Dodge Chrysler Jeep  
Ram and Isiah S. White*

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

**Transcripts**

1. Transcript of Hearing on November 16, 2017;
2. Transcript of Hearing on January 9, 2018;

**Pleadings**

3. Summons and Complaint;
4. Appellants' Answer to the Complaint;

**Motions**

5. Appellants' Motion to Stay and/or Dismiss and Compel Arbitration;
6. Appellants' Memorandum in Support of Motion to Stay and/or Dismiss and Compel Arbitration with all exhibits and attachments referenced;
7. Respondent's Memorandum in Opposition to Appellants' Motions to Stay and/or Dismiss and Compel Arbitration;
8. Appellants' Supplemental Memorandum in Support of Motion to Stay and/or Dismiss and Compel Arbitration with all exhibits and attachments referenced;
9. Respondent's Supplemental Memorandum in Opposition of Motion to Stay and/or Dismiss and Compel Arbitration;
10. Respondents' Motion to Compel Discovery Responses;

**Orders**

11. Order Denying Appellants' Motion to Stay and/or Dismiss and Compel Arbitration;
12. Order Granting Respondent's Motion to Compel Discovery Responses;

**Other**

13. Appellants' Notice of Appeal re: Order Denying Motion to Stay and/or Dismiss and Compel Arbitration;

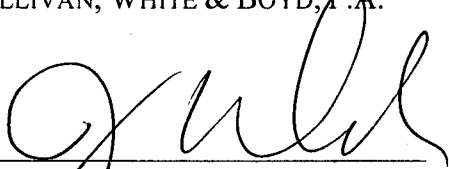
14. Appellants' Notice of Appeal re: Order Granting Motion to Compel Discovery Responses.

Pursuant to Rule 209(c), counsel for Appellants certifies that this Designation contains no matter that is irrelevant to this appeal.

Respectfully submitted,

GALLIVAN, WHITE & BOYD, P.A.

By:

  
\_\_\_\_\_  
John T. Lay, Jr.  
Jessica A. Waller  
Alice P. Adams  
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*Attorneys for Appellants Savannah  
Highway Automotive Company, a  
General Partnership d/b/a Rick  
Hendrick Dodge Chrysler Jeep Ram  
and Isiah S. White*

June 4, 2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

Case Tracking No. 2018-000171

APPEAL FROM CHARLESTON COUNTY COURT OF COMMON PLEAS  
Civil Action No. 2017-CP-10-2148  
J. C. Nicholson, Jr., Circuit Court Judge

Cleo Sanders ..... Respondent

v.

Savannah Highway Automotive Company, a General  
Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep  
Ram, Santander Consumer USA Holdings, Inc.,  
Isiah S. White, Danny Anderson and Patrick Bachrodt, Jr. .... Defendant

Of whom, Savannah Highway Automotive Company, a  
General Partnership d/b/a Rick Hendrick Dodge Chrysler  
Jeep Ram and Isiah S. White are the ..... Appellants

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**PROOF OF SERVICE**

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I, the undersigned employee of Gallivan, White & Boyd, P.A., do hereby certify that I have caused the below referenced to be served via U.S. Mail, postage prepaid, *or by other delivery as indicated*, to all parties of record at the address(es) shown below.

1. Appellants' Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White's Designation of Matter to be Included in Record on Appeal

C. Steven Moskos, Esquire  
C. Steven Moskos, P. A.  
4000 Faber Place Drive  
Suite 300  
Charleston, South Carolina 29405

  
Amber M. Miller, Legal Assistant

Date: June 4, 2018

June 4, 2018

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

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SC Court of Appeals

RE: *Cleo Sanders v. Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram, Santander Consumer USA Holdings, Inc., Isiah S. White, Danny Anderson and Patrick Bachrodt, Jr.*  
Charleston County Case No. 2017-CP-10-02148  
Court of Appeal Case No.: 2018-000171  
GWB File No.: 8493-6

Dear Ms. Kitchings:

Enclosed for filing with your office are the following:

1. Appellants' Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White's Initial Brief;
2. Appellants' Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White's Designation of Matter to be Included in Record of Appeal;
3. Appellants' Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White's Certificate of Compliance; and
4. Proofs of Service.

I would appreciate you filing the original and returning a clocked copy to me by the awaiting individual from my office.

With kind regards, I am

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

  
Jessica A. Waller

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JAW:amm

Enclosures

cc: C. Steven Moskos, Esquire