

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge  
Deadra L. Jefferson, Circuit Court Judge

---

Case No. 2011-CP-10-08011  
Appellate Case No. 2018-000460

---

**RECEIVED**  
OCT 17 2018  
SC Court of Appeals

Assistive Technology Medical  
Equipment Services, LLC, ..... Respondent,

v.

Hood & Selander, CPAS, LLC; Donna C. Cash,  
as Personal Representative of the Estate of  
Dorothy A. Connelly; W.E. Applegate, III,  
as Personal Representative of the Estate of  
James B. Connelly, Kimberly Cuce; Phillip DeClemente, ..... Defendants,

Of whom Phillip DeClemente is the ..... Appellant.

---

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

---


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

1. Smith Affidavit filed January 9, 2014;
2. Smith Affidavit filed December 8, 2015;
3. Return Receipt of December 1, 2011;
4. Reed Deposition Transcript, pp. 210-211, 235-236;
5. Smith Deposition Transcript, pp. 13-14, 26-28, 44-45, 79-80, 86-87, 108, 110-111;
6. Burkett Deposition Transcript, pp. 13-25;
7. Transcript of November 1, 2016 damages hearing;
8. Transcript of January 5, 2017 damages hearing.

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

Respectfully submitted,

October 17, 2018

 with permission and  
on behalf of

Blake A. Hewitt # 73674  
BLUESTEIN THOMPSON SULLIVAN, LLC  
PO Box 7965  
Columbia, South Carolina 29202  
(803) 779-7599

Attorney for Respondent

**RECEIVED**  
OCT 17 2018  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge  
Deadra L. Jefferson, Circuit Court Judge

---

Case No. 2011-CP-10-08011  
Appellate Case No. 2018-000460

---

Assistive Technology Medical  
Equipment Services, LLC, ..... Respondent,

v.

Hood & Selander, CPAS, LLC; Donna C. Cash,  
as Personal Representative of the Estate of  
Dorothy A. Connelly; W.E. Applegate, III,  
as Personal Representative of the Estate of  
James B. Connelly, Kimberly Cuce; Phillip DeClemente, ..... Defendants,

Of whom Phillip DeClemente is the ..... Appellant.

---

**PROOF OF SERVICE**

---

The undersigned hereby certifies that on the date indicated below she served  
counsel for the Appellant with a copy of the *Initial Brief of Respondent and Designation  
of Matter to be Included in the Record* by mailing copies of the same by United States  
Mail with first class postage prepaid to the following address:

Cameron L. Marshall  
7 Gamecock Ave, Ste 707  
Charleston, SC 29407-3379



---

Erin Bridges

October 17, 2018