

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS

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Joseph M. Strickland, Master-in-Equity Judge

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Appellate Case No. 2018-001156

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**RECEIVED**

NOV 30 2018

SC Court of Appeals

Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant,

v.

Coogler Construction Company, Inc.,.....Respondent.

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

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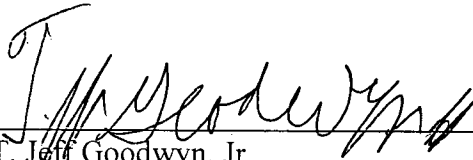
Appellant proposes the following to be included in the Record on Appeal.

1. Order Denying Reconsideration dated June 12, 2018.
2. Reply to Motion to Reconsider date May 10, 2018.
3. Motion to Reconsider dated May 7, 2018.
4. Order of Judgment dated April 25, 2018.
5. Form 4 Order to Restore Order dated April 25, 2018.
6. Consent Order referring matter to Master in Equity dated May 11, 2016.
7. Complaint dated January 28, 2016.
8. Answer and Counterclaim dated February 29, 2016.
9. Plaintiff's Reply to Defendant's Answer and Counterclaims.

10. Transcript of Hearing from October 30, 2017 through November 1, 2017.
11. Transcript of Hearing from June 5, 2018.
12. Plaintiff's Trial Exhibits 1-43.
13. Defendant's Trial Exhibits 1-37.
14. All Pleadings and Motions in the case by all parties.

Pursuant to Rule 209(c), SCACR, I certify that this Designation contains no matter which is irrelevant to the appeal.

GOODWYN LAW FIRM, LLC



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Attorney for Appellant

Columbia, South Carolina  
November 30, 2018

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**PROOF OF SERVICE**

I certify that I have served the **Appellant's Initial Brief** along with **Appellant's Designation of Matter to be Included in the Record on Appeal**, by depositing a copy of same in the United States Mail, postage prepaid, on **November 30, 2018**, on the following parties, addressed as follows:

Brian P. Robinson, Esquire  
Bruner, Powell, Wall & Mullins, LLC  
P.O. Box 61110  
Columbia, SC 29260-1110



Mary S. Bush  
Paralegal to T. Jeff Goodwyn, Jr., Esquire  
Goodwyn Law Firm, LLC  
2519 Devine Street  
Suite A  
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November 30, 2018

# GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.\*  
Christopher J. Archer

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\*Also Licensed in Georgia

November 30, 2018

## VIA HAND DELIVERY

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

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NOV 30 2018  
SC Court of Appeals

**RE: *Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co. v. Coogler Construction Company, Inc.***  
*Appellate Case No.: 2018-001156*  
*Our File No.: 3000-0424*

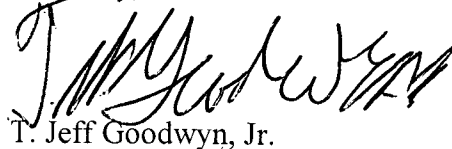
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the **Initial Brief of Appellant and Designation of Matter to Be Included in the Record on Appeal**, along with the Proof of Service, in regard to the above-referenced matter.

By copy of this letter and as evidenced by the attached Proof of Service, I am serving a copy of the Initial Brief of Appellant and Designation of Matter upon Brian P. Robinson, Esquire, attorney for the Respondent.

Thank you for your assistance with this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb  
Enclosures

cc: Brian P. Robinson, Esquire