

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

Case No. 2018-000171

RECEIVED
DEC 07 2018
SC Court of Appeals

Cleo SandersRespondent

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

DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL BY RESPONDENT

C. Steven Moskos
C. Steven Moskos, P.A.
4000 Faber Place Drive, Ste. 300
N. Charleston, SC 29405
Telephone: (843) 763-5297

Attorney for Respondent

In addition to those materials previously designated by Appellants, Respondent proposes the following to be included in the Record on Appeal:

Orders

1. Form 4 filed November 20, 2017;
2. Form 4 filed January 18, 2018;
3. Respondent's proposed discovery Order of February 5, 2018;
4. Appellants' proposed discovery Order of February 5, 2018;

Pleadings

5. Santander Consumer USA Holdings, Inc.'s Answer;
6. Notice of Appearance filed January 9, 2018;
7. Respondent's Brief In Opposition to Motion to Compel Arbitration filed November 16, 2017;
8. Respondent's Motion to Compel Discovery filed October 11, 2017;
9. Respondent's Supplemental Memorandum Opposing Motion to Compel Arbitration filed December 4, 2017.

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

**Respectfully Submitted,
C. STEVEN MOSKOS, P.A.**

BY:


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North Charleston, SC 29405
843-763-5297
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December 4, 2018

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Respondent,

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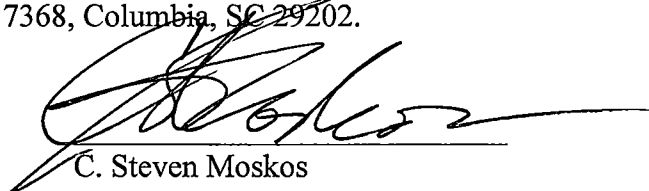
Defendants,

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

Appellants.

PROOF OF SERVICE

I certify that I have served the foregoing Brief and Designation of Matter on Savannah Highway Automotive Company, a General Partnership d/b/a Rick Hendrick Dodge Chrysler Jeep Ram and Isiah S. White by depositing a copy of it in the United States Mail, postage prepaid, on December 4, 2018, addressed to its attorneys of record John T. Lay, Jr., Jessica A. Waller, and Alice P. Adams at Gallivan, White and Boyd, PA, P.O. Box 7368, Columbia, SC 29202.



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Attorney and Counselor at Law

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Board Certified Civil Trial Attorney
Board Certified Civil Pretrial Advocate
By the National Board of Trial Advocacy
Supreme Court of South Carolina Certified Mediator

M

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December 4, 2018

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

**Re: Cleo Sanders vs. Savannah Highway Automotive Company, et. al.
Appellate Case No. 2018-000171**

Dear Ms. Kitchings:

Please find enclosed one original and one copy of the following:

1. Cleo Sanders' Initial Brief,
2. Cleo Sanders' Designation of Matter to be Included in Record of Appeal, and
3. Proof of Service.

By copy of this letter I am hereby serving a copy of these documents on Appellants' counsel.

If you have any questions, please do not hesitate to contact me.

Sincerely,



C. STEVEN MOSKOS

CSM/csb

Enclosures

cc: John T. Lay, Jr., Esq.
Cleo Sanders

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SC Court of Appeals

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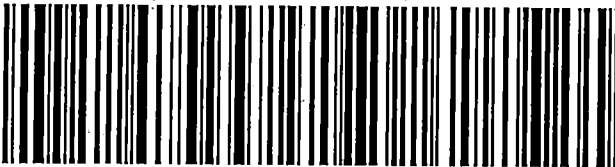
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