

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

**RECEIVED**  
FEB 21 2019  
SC Court of Appeals

Appellate Case No. 2018-001824  
Trial Court Case Nos. 2016-CP-04-02464 and 2016-CP-04-02468

John Cross, ..... Appellant,

v.

Gregory A. Weaver, Earl E. Weaver, Terrie Fallow and Jason Seagraves, ..... Respondents,

And

Steven P. Cross, ..... Appellant,

v.

Gregory A. Weaver, Earl E. Weaver, Terrie Fallow and Jason Seagraves, ..... Respondents.

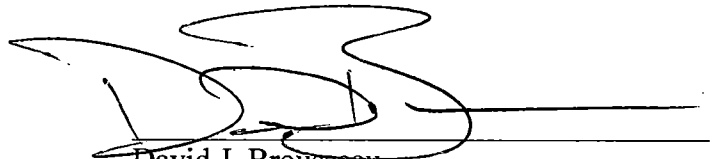
APPELLANTS' DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD ON APPEAL

Appellants propose the following be included in the Record on Appeal:

1. Order denying reconsideration in C/A No. 2016-CP-04-02464 of September 27, 2018;
2. Order denying reconsideration in C/A No. 2016-CP-04-02468 of September 27, 2018;
3. Final Order & Judgment in C/A No. 2016-CP-04-02464 of September 4, 2018;
4. Final Order & Judgment in C/A No. 2016-CP-04-02468 of September 5, 2018;
5. Complaint in C/A No. 2016-CP-04-02464
6. Complaint in C/A No. 2016-CP-04-02468
7. Amended Complaint in C/A No. 2016-CP-04-02464
8. Amended Complaint in C/A No. 2016-CP-04-02468
9. Answer in C/A No. 2016-CP-04-02464
10. Answer in C/A No. 2016-CP-04-02468

11. Motion to Reconsider in C/A No. 2016-CP-04-02464
12. Motion to Reconsider in C/A No. 2016-CP-04-02468
13. Affidavits of Default in both cases as to Jason Seagraves and Terrie Fallow
14. Post-Trial Brief of Plaintiffs
15. Defendants' Reply to Plaintiffs' Post-Trial Brief
16. Trial Transcript
17. Plaintiffs' Exhibit 1 (Photos of Site)
18. Plaintiffs' Exhibit 2 (Photos and Medical Records of John Cross)
19. Plaintiffs' Exhibit 3 (Photos and Medical Records of Steven Cross)

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

A handwritten signature in black ink, appearing to read 'David J. Brousseau', is written over a horizontal line. The signature is stylized and somewhat cursive.

David J. Brousseau  
McIntosh, Sherard, Sullivan & Brousseau  
Post Office Box 197  
Anderson, South Carolina 29622  
(864) 225-0001 | 225-0004 (fax)  
Attorney for Appellants

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CERTIFICATE OF SERVICE

I certify that I have served the Appellants' Initial Brief and Designation of Matter to be Included in the Record of Appeal by hand delivering a copy of the same to Respondent Gregory A. Weaver's attorney of record, David F. Stoddard, Esq., 320 East River Street Anderson, South Carolina 29624, and mailing a copy of the same to Respondent Jason Seagraves, 601 Calhoun Road Apt. 30-D Belton, South Carolina 29627 and Respondent Terrie Fallow, 2315 Broadway Lake Road Anderson, South Carolina 29621 via United States mail, postage prepaid this 20<sup>th</sup> day of February, 2019.



David J. Brousseau  
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Post Office Box 197  
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February 20, 2019

**MCINTOSH, SHERARD, SULLIVAN & BROUSSEAU**

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JACK F. McINTOSH, Retired  
MARSHALL P. SHERARD, JR., Partner  
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(864) 225-0001  
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February 20, 2019

**RECEIVED**  
FEB 21 2019  
SC Court of Appeals

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

RE: *John Cross v. Weaver, et al* and *Steven P. Cross v. Weaver, et al*,  
Appellate Case No.: 2018-001824

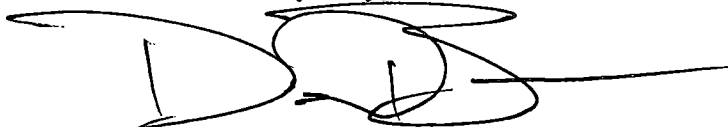
Dear Ms. Kitchings;

Enclosed for filing is the Appellants' Initial Brief. Also enclosed are the following:

- (1) Appellants' Designation of Matter to Be Included in the Record on Appeal; and
- (2) Proof of Service on the Respondents.

With kindest regards, I remain

Yours very truly,



David J. Brousseau  
Attorney for Appellants

DJB/tlc

cc: David F. Stoddard, Esq.  
320 E. River Street  
Anderson, South Carolina 29624

Jason Seagraves  
601 Calhoun Road, Apt. 30-D  
Belton, South Carolina 29627

Terrie Fallow  
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ORIGIN ID:ANDA (864) 225-0001  
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ANDERSON, SC 29621  
UNITED STATES US

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TO HONORABLE JENNY ABBOTT KITCHINGS  
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1220 SENATE STREET

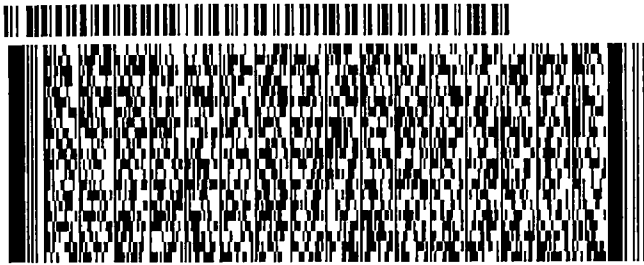
COLUMBIA SC 29201

(803) 734-1890

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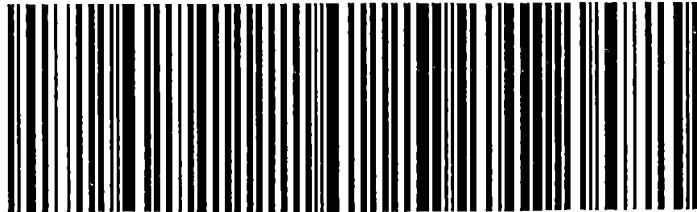
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