

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

RECEIVED

JAN 14 2013

SC Court of Appeals

Civil Action No.: 2010-CP-30-0116

Willie D. Watson Appellant.

v.

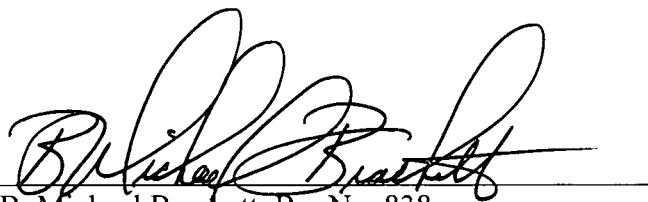
Nancy Carol Underwood, individually and as putative trustee of the
Willie D. Watson Trust; John H. Watson, individually and as putative
trustee of the Willie D. Watson Trust; and Future and Potential Heirs
of Willie D. Watson Respondents.

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

Respondents designate the following particular documents to be included in the Record on Appeal:

1. Appellant's designations;
2. Affidavit of Nancy Underwood, dated May 13, 2010, including incorporated exhibits;
3. Affidavit of John Watson, dated May 17, 2010, including incorporated exhibits;
4. Irrevocable Trust Agreement dated April 2, 2009;
5. Incident Report (Exhibit 6 to the Townsend depo. and Exhibit 1 to Appellant's deposition);
6. John Calvin Watson power of attorney (Exhibit 9 to Appellant's deposition);

7. Dr. Robinson's statement dated April 23, 2009 (Exhibit 11 to Appellant's deposition.);
8. Customer Agreement dated May 6, 2009 (Exhibit 12 to Appellant's deposition.);
9. June 18, 2009 incident report (Exhibit 14 to Appellant's deposition.);
10. Richard Townsend Deposition Transcript:
Vol. 1
Pages: 2-12, 18, 28-32, and 46-48;
Vol. 2
Pages: 1-15
11. Appellant's Deposition Transcript:
Pages: 3-5, 15-19, 26-27, 79-84, 98-99./



B. Michael Brackett, Bar No. 838
Moses & Brackett, PC
P. O. Box 100261
Columbia, SC 29202
803.461.2312
Attorney for Respondents

January 14, 2013

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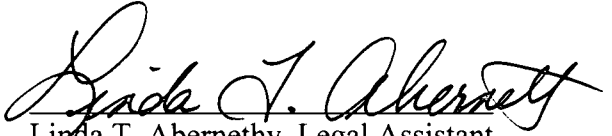
v.

Nancy Carol Underwood, individually and as putative trustee of the
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trustee of the Willie D. Watson Trust; and Future and Potential Heirs
of Willie D. Watson Respondents.

PROOF OF SERVICE

I, Linda T. Abernethy, Legal Assistant to B. Michael Brackett, Esquire, attorney for the Respondents in the above-captioned matter, do hereby certify that I have served counsel for the Appellant with a copy of **Respondents' Designation of Matter to be Included in the Record on Appeal**, by United States Mail, postage prepaid and return address clearly indicated on said envelope, on this 14th day of January, 2013, at the following addresses:

Served: T. Jeff Goodwyn, Jr., Esquire
2519 Devine Street
Suite A
Columbia, SC 29205
Attorney for Appellant


Linda T. Abernethy, Legal Assistant
Moses & Brackett, PC

MOSES & BRACKETT, PC

ATTORNEYS AND COUNSELORS AT LAW

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Columbia, South Carolina 29202-3261

Telephone (803) 461-2300
Facsimile (803) 461-2309

B. Michael Brackett
Direct Dial: (803) 461-2312
Email: mbrackett@mkb-law.com

January 14, 2013

VIA HAND DELIVERY

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

RE: Watson v. Underwood, et. al.
2010-CP-30-0116
Appellate Case No.: 2012-211966
Our File Number - 12006.3

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JAN 14 2013
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing please find the following:

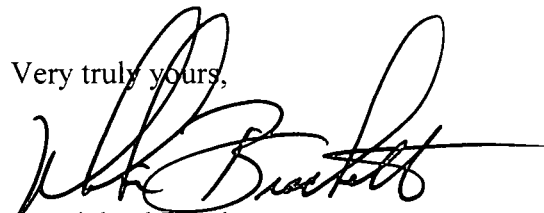
- 1) Respondents' Initial Brief;
- 2) Respondents' Designation of Matter to be Included in the Record on Appeal; and
- 3) Proofs of Service.

By copy of this letter, copies of the enclosures are being served on the Appellant's Attorney,
T. Jeff Goodwyn, Jr.

Please return a clocked of the face pages of the Initial Brief and Designation using the
envelope provided.

Thank you for your courtesy and assistance.

Very truly yours,



B. Michael Brackett

BMB/Ita
Enclosures

cc. Ms. Nancy C. Underwood
Mr. John H. Watson
T. Jeff Goodwyn, Jr., Esquire