

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2018-001908

RECEIVED
APR 26 2019
SC Court of Appeals

Dorothy M. Jackson, Individually and as Guardian ad Litem
for Jordan B., a minor under the age of eighteen (18) year. *Appellant,*

v.

Allen Clack and Claudia Dean : *Defendants,*

Of Whom Claudia Dean is *Respondent.*

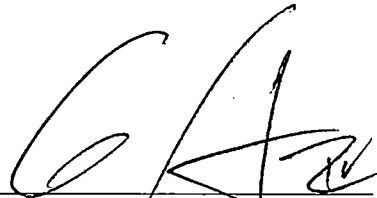
**RESPONDENT’S DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Respondent hereby designates the following to be included in the Record on Appeal:

1. Complaint (filed August 22, 2017);
2. Answer on Behalf of Defendant Claudia Dean (filed November 3, 2016);
3. Defendant Claudia Dean’s Motion for Summary Judgment Against Plaintiff’s Complaint (filed December 28, 2017);
4. Defendant Claudia Dean’s Memorandum in Support of Motion for Summary Judgment (including all exhibits) (filed September 4, 2018);
5. Transcript of Hearing on September 5, 2018;
6. Order Granting Defendant Claudia Dean’s Motion for Summary Judgment (filed September 10, 2018);
7. Notice of Motion and Motion to Reconsider (filed September 18, 2018);
8. E-mail Correspondence from Geov Hanna to Judge Hayes (September 19, 2018);

9. Order (filed September 21, 2018);
10. E-mail Correspondence from Paige George to Judge Hayes (September 24, 2018);
11. E-mail Correspondence chain between Judge Hayes and Paige George (September 25, 2018);
12. Order (filed September 27, 2018);
13. Notice of Motion and Motion to Reconsider (filed October 3, 2018);
14. E-mail Correspondence from Geov Hanna to Judge Hayes (October 4, 2018);
15. Order (October 8, 2018);
16. Order (October 15, 2018).

The undersigned counsel for Respondent certifies that this designation contains no matter which is irrelevant to this appeal.



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Attorneys for Respondent

April 26, 2019

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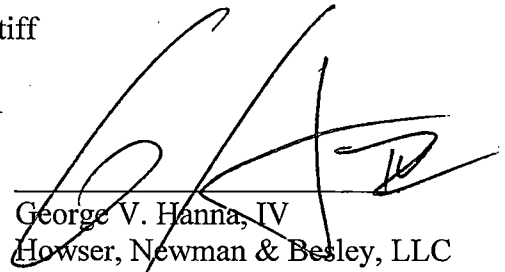
Allen Clack and Claudia Dean *Defendants,*

Of Whom Claudia Dean is *Respondent.*

PROOF OF SERVICE

The undersigned hereby certifies that on this 26th day of April, 2019, he served all counsel of record with the foregoing *Respondent's Designation of Matter to be Included in the Record on Appeal*, by having a copy of it deposited in the United States Mail, postage prepaid, addressed to the following:

Barry George
Paige B. George
Attorneys for the Plaintiff
1419 Bull Street
Columbia, SC 29201



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April 26, 2019

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^ Certified Circuit Court Mediator and Arbitrator
* Also Admitted in North Carolina
§ Also Admitted in California

April 26, 2019

VIA HAND-DELIVERY

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

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SC Court of Appeals

RE: Dorothy M. Jackson, Individually and as Guardian ad Litem
for Jordan B., a minor under the age of eighteen (18) year v. Allen Clack and
Claudia Dean
Appellate Case No.: 2018-001908
Our Matter No.: 267-362

Dear Ms. Kitchings:

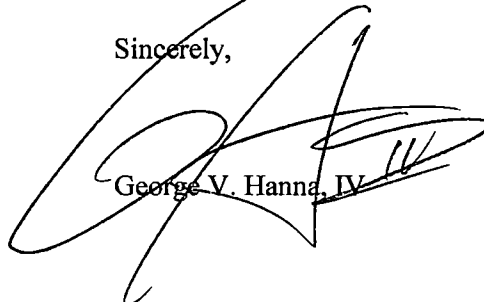
Enclosed for filing, please find the following documents in the above-referenced matter:

1. An original and one (1) copy of the *Initial Brief of Respondent* and its *Proof of Service*; and
2. An original and one (1) copy of *Respondent's Designation of Matter to be Included in the Record on Appeal* and its *Proof of Service*.

Please return a clocked copy of each of these documents to me via our courier. By copy of this letter I am serving all counsel of record with a copy of these filings.

Please do not hesitate to contact me if you have any questions.

Sincerely,


George V. Hanna, IV

GVH/cmt
Enclosures

cc: Barry George
Paige B. George

HNB

**HOWSER, NEWMAN
& BESLEY, LLC**

Attorneys and Counselors at Law

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The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
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