

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

**APPELLATE CASE NO. 2019-000076**

Case No. 2017-CP-10-03110  
(formerly Probate Court Case No. 2010-ES-10-00413)

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SC Court of Appeals

CAROL MANIGAULT,

Appellant,

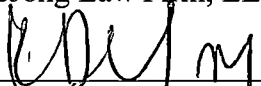
v.

MORRIS ELLISON, AS PERSONAL  
REPRESENTATIVE OF THE ESTATE  
OF ANDREW MANIGAULT,

Respondent.

**APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD OF APPEAL**

Dated: May 20, 2019

DeJong Law Firm, LLC  
By:   
Karen M. DeJong, Esq.  
Bar No. 70699  
222 West Coleman Blvd., Ste. 110  
Mount Pleasant, SC 29464  
Tel. No. 843-216-6161  
Fax No. 843-300-1080  
[karen@dejonglawfirm.com](mailto:karen@dejonglawfirm.com)  
Attorney for Appellant

Appellant proposes the following be included in the Record on Appeal:

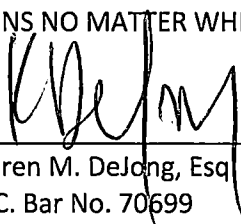
1. Charleston County Court of Common Pleas Order Granting Defendant's Motion for Relief From Foreign Judgment signed by Hon. Roger Young and filed on August 1, 2011 under Case No. 2010-CP-10-9512
2. Motion for Summary Judgment on behalf of Personal Representative filed on November 18, 2016 in the Charleston County Probate Court under Case No. 2010-ES-10-0413
3. Opposition to Motion for Summary Judgment on behalf of Carol Manigault filed on January 17, 2017 in the Charleston County Probate Court under Case No. 2010-ES-10-0413
4. Charleston County Probate Court's Order Granting Summary Judgment signed by Hon. Tamara Curry on April 7, 2017 in the Charleston County Probate Court under Case No. 2010-ES-10-0413
5. Motion to Alter or Amend Judgment on behalf of Carol Manigault filed on April 24, 2017 in The Charleston County Probate Court under Case No. 2010-ES-10-0413
6. Charleston County Probate Court's Order Denying Motion to Alter or Amend Judgment Signed by Hon. Tamara Curry dated June 1, 2017 under Case No. 2010-ES-10-0413
7. Notice of Intent to Appeal to Circuit Court filed on June 16, 2017 in the Charleston County Court of Common Pleas under Case No. 2017-CP-10-3110
8. Statement of Issues on Appeal filed on July 28, 2017 in the Charleston County Court of Common Pleas under Case No. 2017-CP-10-3110
9. Appellant's Initial Brief filed on August 30, 2017 with Record on Appeal (ROA) Notations by James Myrick, Esq., Respondent's attorney, and presented as an Exhibit at Appellate Hearing Before Hon. J. Mark Hayes, II on July 30, 2018 under Case No. 2017-CP-10-3110
10. Appellant's Designation of Matters to be Included in the Record on Appeal filed on August 30, 2017 in the Charleston County Court of Common Pleas under Case No. 2017-CP-10-3110
11. Respondent's Initial Brief filed on August 30, 2017 with Record on Appeal (ROA) Notations By James Myrick, Esq., Respondent's attorney, and presented as an Exhibit at Appellate Hearing before Hon. J. Mark Hayes, II on July 30, 2018 under Case No. 2017-CP-10-3110
12. Respondent's Designation of Matters to be Included in the Record on Appeal filed on August 25, 2017 in the Charleston County Court of Common Pleas under Case No. 2017-CP-10-3110
13. Comparison of 2010 and 2014 S.C. Code (3 pages) submitted by James Myrick, Esq., Respondent's attorney at the appellate hearing on July 30, 2018
14. Transcript of Appellate Hearing held on July 30, 2018 before Hon. J. Mark Hayes, II
15. Order Denying Appeal filed on December 27, 2018 in the Charleston County Court of

Common Pleas signed by Hon. J. Mark Hays, II under Case No. 2017-CP-10-3110

16. Notice of Appeal filed on January 27, 2019 at the South Carolina Court of Appeals

I CERTIFY THAT THIS DESIGNATION CONTAINS NO MATTER WHICH IS IRRELEVANT TO THIS APPEAL.

May 20, 2019



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Karen M. DeJong, Esq  
S.C. Bar No. 70699  
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Attorney for the Appellant

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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

**APPELLATE CASE NO. 2019-000076**  
Case No. 2017-CP-10-03110  
(formerly Probate Court Case No. 2010-ES-10-00413)

CAROL MANIGUALT,

Appellant,

v.

MORRIS ELLISON, AS PERSONAL  
REPRESENTATIVE OF THE ESTATE  
OF ANDREW MANIGAULT,

Respondent.

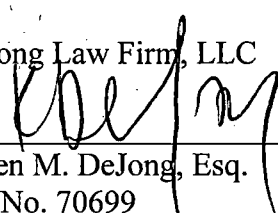
**PROOF OF SERVICE**

I certify that I have served Appellant's Initial Brief, Appellant's Designation of Matter to be Included in the Record on Appeal on Respondent Morris Ellison, by fax and depositing a copy of it via commercial delivery on May 20, 2019, addressed to his attorney of record, James D. Myrick, Esq., Womble Bond Dickinson, LLP, 5 Exchange Street, Charleston, SC 29402.

May 20, 2019

By:

DeJong Law Firm, LLC

  
Karen M. DeJong, Esq.

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Attorney for Appellant

**Other Counsel of Record:**

James D. Myrick, Esq.  
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Charleston, SC 29401  
Attorney for Respondent

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BY FAX AND OVERNIGHT MAIL

May 20, 2019

Hon. Jenny Abbott Kitchings  
S.C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

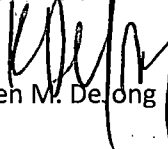
Re: Carol Manigault v. Morris Ellison, Personal Representative of the Estate of Andrew Manigault  
Case No. 2019-000076  
Formerly Case No. 2017-CP-10-03110

Dear Hon. Kitchings:

Enclosed please find original and one copy of Appellant's Initial Brief, Appellant's Designation of Matter to be Included in the Record on Appeal and Proof of Service in connection with the above captioned matter.

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

Very truly yours,

  
Karen M. DeJong

KMD:abc

cc:

James D. Myrick, Esq.  
Womble Bond Dickinson LLP  
5 Exchange Street  
Charleston, SC 29401

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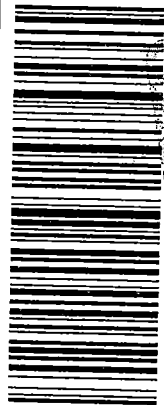
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SC Court of Appeals

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