

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Paul Burch, Circuit Court Judge

Case No. 2017-CP-40-05538  
Appellate Case No: 2018-002026

**RECEIVED**  
JUN 28 2019  
SC Court of Appeals

Pearlz Vista, Inc., d/b/a Pearlz  
Oyster Bar, Carolina Ale  
House Operating Company  
LLC, d/b/a Carolina Ale  
House and Art Bar,

Respondents,

v.

Latoria Cooks,

Appellant.

DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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

1. Complaint – Case No. 2016-CP-40-05226;
2. Complaint – Case No. 2017-CP-40-05538;
3. Answer of Defendant Carolina Ale House Operating Company d/b/a Carolina Ale House;
4. Defendants' Joint Motion for Summary Judgment;
5. Defendants' Motion Exhibits;
6. Defendant's Motion for Protective Order;
7. Transcript of Proceedings on September 5, 2018;
8. Order Granting Summary Judgment on September 5, 2018;
9. Transcript of Deposition of Emily Brown pp. 13-21; 26;

{00106202-2}

10. Plaintiff's Responses to Defendant's Request to Admit;
11. Plaintiff's Supplemental Responses to Defendant's Request to Admit

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

June 26, 2019



Robert D. Moseley, Jr. (SC Bar #64084)

Megan Early-Soppa (SC Bar # 101186)

Moseley Marcinak Law Group LLC

4324 Wade Hampton Blvd., Suite B

PO Box 26148 (29616)

Greenville, South Carolina 29687

(864) 248-6025 (864) 248-6035 (Fax)

[Rob.Moseley@momarlaw.com](mailto:Rob.Moseley@momarlaw.com)

[Megan.Early@momarlaw.com](mailto:Megan.Early@momarlaw.com)

Attorneys for Respondent

Carolina Ale House Operating Company,

LLC, d/b/a Carolina Ale House

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Paul M. Burch, Circuit Court Judge

---

Case No: 2017-CP-40-05538  
Appellate Case No: 2018-002026

---

Pearlz Vista, Inc., d/b/a Pearlz  
Oyster Bar, Carolina Ale  
House Operating Company,  
LLC, d/b/a Carolina Ale  
House, and Art Bar, Inc.

Respondents,

v.

Latoria Cooks,

Appellant.

**RECEIVED**  
JUN 28 2019  
SC Court of Appeals

---

PROOF OF SERVICE

---

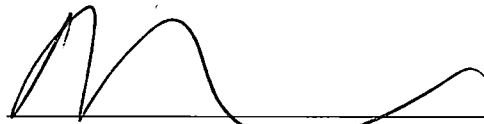
I, the undersigned, as counsel for Respondent Carolina Ale House Operating Company, LLC, d/b/a Carolina Ale House, do hereby certify that I have on this date served the foregoing Initial Brief of Respondent Carolina Ale House Operating Company, LLC, d/b/a Carolina Ale House and Designation of Matter to Be Included in the Record on Appeal on attorneys of record this 26<sup>th</sup> day of June, 2019, by depositing a copy of the same in the United States Mail, postage prepaid, addressed to:

Sarah P. Spruill  
Haynsworth Sinkler Boyd  
PO Box 2048  
Greenville, SC 29602

John W. Carrig, Jr.  
120 North Lake Drive  
Lexington, SC 29071

Joseph M. McCulloch  
McCulloch & Schillaci  
PO Box 11623  
Columbia, SC 29211

John P. Riordan  
Fox Rothschild LLP  
PO Box 87  
Greenville, SC 29602



Robert D. Moseley, Jr. (SC Bar #64084)

Megan Early-Soppa (SC Bar # 101186)

Moseley Marcinak Law Group LLP

4324 Wade Hampton Blvd., Suite B

PO Box 26148, Greenville, SC 29616

(864) 248-6025 (864) 248-6035 (Fax)

[Rob.Moseley@momarlaw.com](mailto:Rob.Moseley@momarlaw.com)

[Megan.Early@momarlaw.com](mailto:Megan.Early@momarlaw.com)

Attorneys for Respondent

Carolina Ale House Operating Company, LLC

d/b/a Carolina Ale House



MOSELEY  
MARCINAK  
LAW GROUP

Robert D. Moseley, Jr.  
Direct Dial: 864.248.6026  
Email: Rob.Moseley@momarlaw.com

June 26, 2019

**RECEIVED**

JUN 28 2019

**SC Court of Appeals**

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

Re: Latoria R. Cooks v Perlz Vista, Inc. d/b/a Pearlz Oyster Bar,  
Carolina Ale House Operating Company, LLC d/b/a Carolina Ale House  
and Art Bar, Inc.  
Appellate Case No. 2018-002026

Dear Ms. Kitchings:

Enclosed for filing is the original and one copy of the following:

1. Respondent Carolina Ale House Operating Company, LLC d/b/a Carolina Ale House's Initial Brief
2. Designation of Matter
3. Motion to File Out of Time
4. Proof of Service
5. Check in the amount of \$50.

Thank you for your consideration.

With best regards, I remain,

Very truly yours,

Robert D. Moseley, Jr.  
Moseley Marcinak Law Group LLP

RDMjr:csb  
Enclosures

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
June 26, 2019  
Page 2

cc: John P. Riordan  
Fox Rothschild LLP  
PO Box 87  
Greenville, SC 29602

Sarah P. Spruill  
Haynsworth Sinkler Boyd  
PO Box 2048  
Greenville, SC 29602

John W. Carrig, Jr.  
120 North Lake Drive  
Lexington, SC 29071

Joseph M. McCulloch  
McCulloch & Schillaci  
PO Box 11623  
Columbia, SC 29211

Moseley Marcinak Law Group  
Attn: Karen Parker  
PO Box 26148  
Greenville, SC 29616



**RECEIVED**  
JUN 28 2019  
SC Court of Appeals



U.S. POSTAGE PAID  
FORM 3829  
TAYLORS, SC  
29697  
JUN 28, 19  
AMOUNT  
**\$0.15**  
R2305M144662-4

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

