

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

JUL 12 2019

Walton J. McLeod, IV, Circuit Court Judge

SC Court of Appeals

Appellate Case No.: 2018-002236

Case No. 2016-CP-32-00950

Amy S. Davis, as Personal Representative of the Estate of Utricia Shealy, deceased,  
.....Respondent,

v.

Agape Nursing & Rehabilitation Center, Inc., and Agape Management Services,  
Inc.,.....Appellants.

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

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

1. Pleadings:
  - a. Filed copy of Respondent’s Offer of Judgment dated September 15, 2016;
  - b. Filed copy of Respondent’s Amended Offer of Judgment dated February 1, 2017;
  - c. Filed copy of Respondent’s Response in Opposition to Appellants’ Motion for Judgment Notwithstanding the Verdict, or in the alternative, a Motion for a New Trial Absolute, or in the alternative, a Motion for a New Trial *Nisi Remittitur* dated November 14, 2018;
  - d. Filed copy of Respondent’s Response in Opposition to Appellants’ Motion for Leave to Deposit and Stay the Accrual of Interest and Execution Pending a Ruling on Post-Trial Motions and Any Appeal dated November 14, 2018

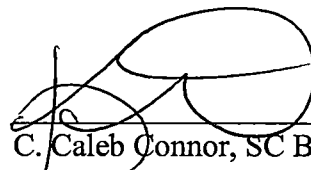
2. Trial Transcript from proceedings on October 22, 2018 through October 26, 2018, entire transcript;

3. Trial Exhibits:

- a. Joint Exhibit 2, pp. LMC\_C&C\_443, 481;
- b. Joint Exhibit 10;
- c. Joint Exhibit 12;
- d. Joint Exhibit 14;
- e. Joint Exhibit 18;
- f. Joint Exhibit 25;
- g. Joint Exhibit 27;
- h. Plaintiff's Exhibit 2;
- i. Plaintiff's Exhibit 3;
- j. Plaintiff's Exhibit 4;

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

Dated: July 12, 2019



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C. Caleb Connor, SC Bar No. 100517  
A/ Keith McAlister, Jr., SC Bar No. 78213  
Kenneth L. Connor, SC Bar No. 100298  
CONNOR & CONNOR, LLC  
302 Park Avenue SE  
Aiken, South Carolina 29801  
P: (803) 226-0543  
F: (800) 480-9715  
Email: [caleb@theconnorfir.com](mailto:caleb@theconnorfir.com)

*Attorneys for Respondent*

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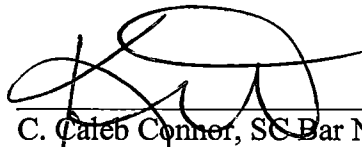
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Agape Nursing & Rehabilitation Center, Inc., and Agape Management Services,  
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**PROOF OF SERVICE**

I certify that this the 12th day of July, 2019, I have caused to be served a copy of the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal upon Appellants Agape Nursing & Rehabilitation Center, Inc. and Agape Management Services, Inc. causing a copy of same to be deposited in the United States mail, postage prepaid, addressed as following:

Shaun C. Blake, Esq.  
Rogers Lewis Jackson Mann & Quinn, LLC  
1901 Main Street, Suite 1200  
Columbia, SC 29201



C. Caleb Connor, SC Bar No. 100517  
A. Keith McAlister, Jr., SC Bar No. 78213  
Kenneth L. Connor, SC Bar No. 100298  
CONNOR & CONNOR, LLC  
302 Park Avenue SE  
Aiken, South Carolina 29801

P: (803) 226-0543  
F: (800) 480-9715  
Email: [caleb@theconnorfirm.com](mailto:caleb@theconnorfirm.com)

*Attorneys for Respondent*