

THE STATE OF SOUTH CAROLINA
In The South Carolina Court of Appeals

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

Hon. R. Lawton McIntosh
Circuit Court Judge

Case No. 2016-CP-03-00286
Appellant Case No.: 2019-000736

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SC Court of Appeals

William Hunter Youmans,APPELLANT

vs.

Mark B. Tinsley and Diane E. Tinsley,RESPONDENTS

DESIGNATION OF MATTER

Appellant William Hunter Youmans hereby submits proposed designation of matter for the Record on Appeal in this case pursuant to SCACR 209(a) and designates the following matter for inclusion within the record in this appeal, as may subsequently be agreed to by consultation of counsel subsequent to service.

1. December 27, 2016 - Civil Action Cover Sheet, Summons and Complaint.
2. January 17, 2017, Third-Party Summons, Answer, Counterclaim, and Third-Party Complaint of Defendants.
4. February 14, 2017, Reply to Counterclaims by Plaintiff William Hunter Youmans.
5. February 17, 2017, Motion to Dismiss J. Cameron Halford, Third-Party Defendant.
6. April 28, 2017, Plaintiff Notice of Motion and Motion to Compel Discovery.

7. April 28, 2017, Plaintiff Motion for Inspection SCRCP 34(a).
8. May 18, 2017, Plaintiff Motion for Judgment on the Pleadings.
10. June 12, 2017, Affidavit of Kevin Youmans.
12. June 19, 2017, Letter to the Honorable Lawton R. McIntosh.
13. June 19, 2017, Letter from Attorney Walter H. Sanders, Jr., P.A.
14. June 21, 2017, Defendant Responses to Request for Admission of Fact.
15. June 21, 2017, Affidavit of Robert Martin Youmans.
16. June 21, 2017, Defendant Response to Interrogatories filed with court record
17. June 23, 2017, Order.
18. August 23, 2017, Order.
19. September 28, 2017, Plaintiff Motion to Strike Counterclaims.
20. September 28, 2017, Second Plaintiff Notice of Motion and Motion to Compel Discovery.
21. October 11, 2017, Summons, Amended Answer and Counterclaim of the Defendants.
22. October 30, 2017, Defendants' Motion for Summary Judgment.
23. October 30, 2017, Memorandum in Support of Motion for Summary Judgment.
24. March 5, 2018, Plaintiff Memorandum in Opposition to Defendants' Motion for Summary Judgment.
25. March 7, 2018, Affidavit of Stephen Youmans, M.D. in Opposition to Summary Judgment and filed in Support of Memorandum Opposing Summary Judgment.
26. April 11, 2018, Mediation Results Report.
28. July 6, 2018, Order of Hon. R. Lawton McIntosh
29. August 8, 2018, Order of Hon. R. Lawton McIntosh

30. November 28, 2018, Order of Hon. R. Lawton McIntosh
31. December 3, 2018, Plaintiff Rule 59 Notice of Motion and Motion to Reconsider.
32. January 8, 2019, Order of Hon. R. Lawton McIntosh
33. March 15, 2019, Motion for Summary Judgment as to all Defendants' Counterclaims.
34. March 15, 2019, Plaintiff Memorandum in Support of Summary Judgment as to Defendants' Counterclaims.
35. March 25, 2019, Plaintiff Memorandum in Support of Rule 59(e) Motion to Alter or Amend.
36. March 28, 2019, Order Hon. R. Lawton McIntosh
37. April 8, 2019, Order of Hon. R. Lawton McIntosh
38. April 29, 2019, Notice of Appeal and Exhibit.

Transcript of Court Proceedings: (Excerpts as may be agreed between counsel):

1. June 23, 2017, Transcript of June 22, 2017 Allendale arguments
2. August 23, 2017, Transcript of Order
3. July 6, 2018, Transcript of Argument before R. Lawton McIntosh
4. August 8, 2018, Transcript of Order.
5. November 28, 2018, Transcript of Order.
6. January 8, 2019, Transcript of Order.
7. March 27, 2019 Transcript of Rule 59(e) arguments Greenwood, South Carolina

Deposition Testimony :

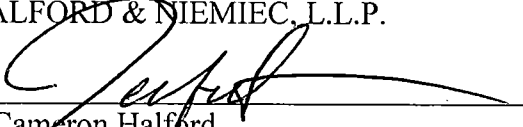
1. December 11, 2017, Deposition of Mark Tinsley. (Excerpts as may be agreed)

Correspondences with Court :

1. October 18 Halford letter with attachments to Hon. R. Lawton McIntosh
2. Court Scheduling e-mails 3/14/2019-3/26/2019 re: Greenwood, SC arguments

Respectfully submitted,

HALFORD & NIEMIEC, L.L.P.



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Attorneys for Appellant Hunter Youmans

July 31, 2019

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Hon. R. Lawton McIntosh
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PROOF OF SERVICE FOR INITIAL BRIEF OF APPELLANT,
DESIGNATION OF MATTER AND SCACR 211(b) CERTIFICATION

I hereby certify that I am the Attorney for the Appellant in the above captioned Appeal and that I did on July 31, 2019 serve by U.S. Mail and e-mail a copy of Appellant's Initial Brief and Designation of Matter upon counsel for Respondents, addressed as follows. I further certify that Appellant's Initial Brief complies with Rule 211(b)(1) and Rule 211(b)(2) as to content requirements.

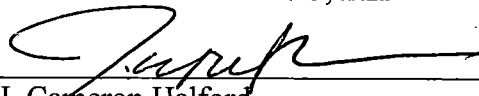
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Respectfully submitted,

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July 31, 2019

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July 31, 2019

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

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Re: William Hunter Youmans v. Mark B. Tinsley and Diane E. Tinsley
Appellant Case No.: 2019-000736

Dear Ms. Kitchings:

Enclosed please find the original and one copy each of the Appellant's Initial Brief along with the Designation of Matter and SCACR 211(b) Certification regarding the above-referenced matter as well as the original and one copy each of the Proofs of Service. In this regard, I would appreciate your filing these documents and returning the clocked copies to my office in the envelope provided. If you have any questions regarding the enclosed or this matter, please do not hesitate to contact my office.

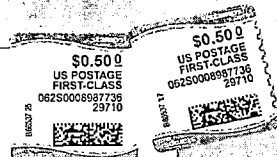
Sincerely,


J. Cameron Halford

JCH:tml

Enclosures

cc: Mr. Hunter Youmans
w/enclosures
Blake Hewitt, Esquire
w/enclosures
Woodrow F. Gooding, Esquire
w/enclosures
Mark B. Tinsley, Esquire
w/enclosures



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