

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
Gordon G. Cooper, Master-in-Equity
Civil Case No. 2018CP4201540

Appellate Case No. 2019-000819

Karolee Russell, Individually, and as Personal Representative of the Estate of Kevin Brian Russell, Respondent,

v.

B&R Contracting, LLC, Brian K. Bass, and Richard A. Robertson, Defendants,

Of whom Richard A. Robertson is the Appellant.

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. Order of Reference, June 21, 2018
2. Order for Substitution for Deceased Plaintiff, August 1, 2018
3. Order of Default Judgment, October 8, 2018
4. Order Denying Motion to Reconsider, April 11, 2018
5. Summons, May 9, 2018
6. Complaint, May 9, 2018
7. Affidavit of Service of Richard A. Robertson, May 23, 2018
8. Affidavit of Service of Brian Keith Bass, May 23, 2018

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9. Affidavit of Service of B&R Contracting, LLC, May 23, 2018
10. Affidavit of Default, June 20, 2018
11. Motion of Substitution of Deceased Plaintiff, July 31, 2018
12. Affidavit of Death of Co-Plaintiff Kevin Russell, July 31, 2018
13. Affidavit of Attorneys Fees, September 5, 2018
14. Affidavit of Costs, September 5, 2018
15. Certificate of Service for Notice of Hearing, September 11, 2018
16. Certificate of Service for Proposed Order, September 28, 2018
17. Letter for Service of Proposed Order, October 8, 2018
18. Motion to Reconsider, October 19, 2018
19. Certificate of Service for Order of Default Judgment, October 19, 2018
20. Brief in Support of Motion to Reconsider, February 22, 2019
21. Transcript of Final Hearing, September 27, 2018
22. Transcript of Hearing February 25, 2018
23. Notice of Appeal

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RULE 209 SCACR CERTIFICATE OF COUNSEL

The undersigned hereby certifies that the above designation does not contain any matter which is irrelevant to the the appeal.



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Attorney for Respondent

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v.

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Of whom Richard A. Robertson is the Appellant.

PROOF OF SERVICE

I certify that I have served Respondent's Initial Brief on the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid on August 22, 2019.

C. Daniel Atkinson
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August 22, 2019

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SC Court of Appeals

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

SUBJECT: *Russell v. B&R Contracting, LLC et. al.*
Appellate Case No. 2019-000819

Dear Ms. Kitchings,

Enclosed please find the original and one copy of Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal. I am requesting you return the copies in the enclosed envelope. Please feel free to contact me should you have any issues or questions.

Respectfully,

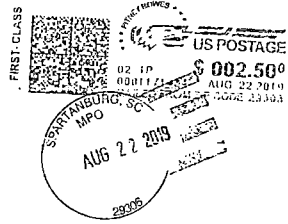
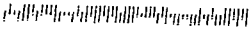


Paul A. "Andy" McKee, III
Attorney for Respondent, Karolee Russell

enclosures.

CC: C. Daniel Atkinson
W. Spencer Barrow
Wilkes Law Firm, PA

B&R Contracting, LLC
Brian K. Bass



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TO:

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