

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

RECEIVED
NOV 01 2019
SC Court of Appeals

Appellate Case No.: 2019-000998

Cecil Rowe,.....Appellant,

v.

Family Health Centers, Inc.,.....Respondent.

AND

Rebecca Rowe,.....Appellant,

v.

Family Health Centers, Inc.,.....Respondent.

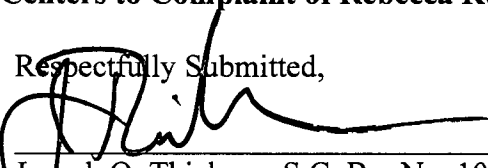
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant hereby designates the following matters pursuant to Rule 209, SCACR:

1. Transcript of Hearing on Respondent's Motion to Consolidate
2. May 15, 2019 Form 4 Order Consolidating Matters for Trial
3. Complaint filed by Rebecca Rowe, 2017-CP-38-1233
4. Complaint filed by Cecil Rowe, 2017-CP-38-1232
5. October 19, 2017 – October 23, 2017 email correspondence between counsel discussing consolidation

6. May 9, 2019 and May 10, 2019 emails from counsel to trial court regarding consolidation for trial
7. Completed Verdict Form
8. Cecil Rowe Incident Report 1
9. Cecil Rowe Incident Report 2
10. Rebecca Rowe Incident Report
11. FHC 30(b)(6) deposition excerpt; p. 39
12. Rebecca Rowe Supplemental Answers to Interrogatories (identifying witness Mayor Sara Ann Johnson)
13. Cecil Rowe Supplemental Answers to Interrogatories (identifying witness Edward Perry)
- 14. Answer/Crossclaim of Family Health Centers to Complaint of Cecil Rowe**
- 15. Answer/Crossclaim of Family Health Centers to Complaint of Rebecca Rowe**

Respectfully Submitted,



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J. Eric Cavanaugh, S.C. Bar No. 100044
Cavanaugh & Thickens, LLC
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AND

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146 Centre St.
Orangeburg, SC 29115
Attorneys for Appellant

Columbia, South Carolina
November 1, 2019

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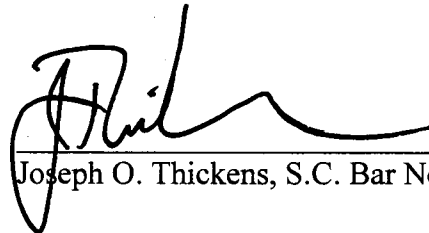
Rebecca Rowe,.....Appellant,

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CERTIFICATION OF COUNSEL

I certify that the foregoing Designation contains no matter which is irrelevant to this appeal.



Joseph O. Thickens, S.C. Bar No. 101398

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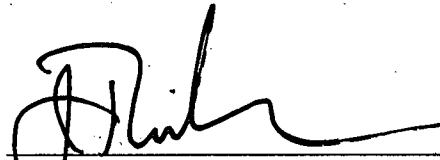
Family Health Centers, Inc.,.....Respondent.

PROOF OF SERVICE

I certify that I have served the Designation of Matter to be Included in the Record on Appeal on all attorneys of record, by depositing a copy of it in the United States Mail, postage prepaid on September 23, 2019, addressed to the following:

John M. Grantland
Phillip Florence
Murphy & Grantland, P.A.
Post Office Box 6648
Columbia, SC 29260
Attorneys for Respondent

SIGNATURE PAGE FOLLOWS



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PROOF OF SERVICE

I certify that I have caused the service of Appellant's Reply Brief on Respondent by U.S. Mail on November 1, 2019 to the attorneys of record at the following addresses:

John M. Grantland
Phillip Florence
Murphy & Grantland, P.A.
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Columbia, SC 29260
Attorneys for Respondent

SIGNATURE PAGE FOLLOWS



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146 Centre St.
Orangeburg, SC 29115

Attorneys for Appellant

Columbia, South Carolina
November 1, 2019

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VIA HAND DELIVERY

Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, SC 29201

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RE: **Appellate Case No.: 2019-000998**

Cecil Rowe vs. Family Health Centers, Inc. and Carolina Kwik Dry, LLC

Civil Action No.: 2017-CP-38-01232

Our File: 1724

Rebecca Rowe vs. Family Health Centers, Inc. and Carolina Kwik Dry, LLC

Civil Action No.: 2017-CP-38-01233

Our File: 1725

Dear Ms. Kitchings:

Please find enclosed the original and one (1) copy of the following:

1. Appellants' Reply Brief;
2. Appellants' Designation of Matter to be Included in the Record on Appeal (additional items in bold).

I would appreciate if you would file the originals and return the remaining clocked copies to me in the enclosed envelope. By copy to this letter, counsel for Respondent is also hereby served with a copy of these documents.

Yours truly,

CAVANAUGH & THICKENS, LLC



Joseph O. Thickers

JOT/

cc: John M. Grantland and Phillip Florence (via U.S. Mail)
Clyde C. Dean, Jr. (via email only)