

**THE STATE OF SOUTH CAROLINA
(In the Court of Appeals)**

**APPEAL FROM HORRY COUNTY
Court of Common Pleas**

Benjamin H. Culbertson, Circuit Court Judge

**RECEIVED
NOV 13 2019
SC Court of Appeals**

Case No. 2017-CP-26-8184

Jane Doe, Appellant,

v.

Crazy Horse Saloon & Restaurant, Inc., d/b/a Thee New Dollhouse and
Dog Leg Right, LLC, Respondents.

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

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

1. Orders for Default Judgment – February 23, 2018;
2. Order Vacating Default Judgment – May 16, 2018;
3. Summary Judgment Order – May 6, 2019;
4. Order Denying Motion to Alter or Amend – July 23, 2019;
5. Complaint – December 12, 2017;
6. Motion for Default with Exhibits – February 22, 2018;

7. Motion to Vacate Default Judgment – March 22, 2018;
8. Motion for Summary Judgment – February 26, 2019;
9. Memorandum in Opposition to Summary Judgment – April 1, 2019;
10. Memorandum Supporting Summary Judgment – April 4, 2019;
11. Motion to Alter or Amend – May 16, 2019;
12. Transcript of the May 15, 2018 Hearing;
13. Transcript of the April 3, 2019 Hearing;
14. Jane Doe Deposition Transcript (redacted), pp. 1 – 3; 11 – 12; 14 – 21; 24 – 26;
34 – 38.
15. Martin McNamee Deposition Transcript, pp. 1 – 3; 12 – 15; and,
16. Defendant’s Supplemental Discovery Responses – March 13, 2019.

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

Respectfully submitted,

S/William J. Luse
William J. Luse, Esquire
SC Bar No: 72790
917 Broadway Street
Myrtle Beach, SC 29577
Phone: (843) 839-4795
bill@getlusenow.com
Attorney for Appellant

Myrtle Beach, South Carolina
November 12, 2019

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v.

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Dog Leg Right, LLC, Respondents.

PROOF OF SERVICE

I certify that I have served Appellant’s Initial Brief and Designation of Matter on Respondents by depositing copies of them in the United States Mail, postage prepaid, on November 12, 2019, addressed to their attorney of record, William H. Monckton, VI, 1300 Professional Dr., Suite 102, Myrtle Beach, SC 29577.

Myrtle Beach, South Carolina
November 12, 2019

S/William J. Luse
William J. Luse, Esquire
SC Bar No: 72790
917 Broadway Street
Myrtle Beach, SC 29577
Phone: (843) 839-4795
Attorney for Appellant

LETTER TO THE APPELLATE COURT CLERK
FILING THE APPELLANT'S INITIAL BRIEF

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November 12, 2019

NOV 13 2019

SC Court of Appeals

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

RE: Jane Doe, Appellant v. Crazy Horse Saloon & Restaurant, Inc., d/b/a Thee
New Dollhouse and Dog Leg Right LLC, Respondents,
Case No. 2017-CP-26-08184

Dear Ms. Kitchings:

Enclosed for filing are two copies of the Appellant's Initial Brief in the above case as well as a self addressed and stamped envelope. Please return one clocked copy of the enclosed documents back to our firm in the envelope provided. Also enclosed are the following:

- (1) Proof of Service of the Appellant's Initial Brief on the respondents;
- (2) Appellant's designation of matter to be included in the record on appeal.

Sincerely,

s/ William J. Luse
William J. Luse, Esquire
SC Bar No: 72790
917 Broadway Street
Myrtle Beach, SC 29577
(843) 839-4795
Attorney for Appellant

cc: William Monckton, VI
1300 Professional Drive, Ste. 201
Myrtle Beach, SC 29577
(843) 946-6556
Attorney for Respondent

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Law Office of William J. Luse
Attn: William J. Luse, Esquire
917 Broadway Street
Myrtle Beach, SC 29577



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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
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