

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master-In-Equity

Appellate Case No.: 2019-000984

RECEIVED

NOV 18 2019

SC Court of Appeals

Michael Collins,

Appellant,

v.

Norfolk Southern Railroad Company,

Respondent.

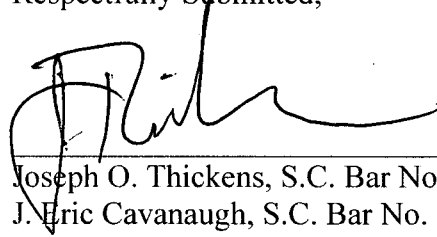
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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

1. Transcript of Hearing May 8, 2019
2. Transcript of Hearing November 15, 2018
3. Order Granting Motion for Summary Judgment March 25, 2019
4. Order Denying Rule 59(e) Motion for Reconsideration May 17, 2019
5. Deposition of Michael Collins
6. Complaint filed by Michael Collins, 2017-CP-46-2574

SIGNATURE PAGE FOLLOWS

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'J. Thickens', written over a horizontal line.

Joseph O. Thickens, S.C. Bar No. 101398
J. Eric Cavanaugh, S.C. Bar No. 100044
Cavanaugh & Thickens, LLC
1324 Gadsden Street (29201)
Post Office Box 2409
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AND

Charles E. Sorey, II
1000 Highland Colony Parkway, Suite 5203
Ridgeland, MS 39211
Attorneys for Appellant

STATE OF SOUTH CAROLINA
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Case No.: 2017-CP-46-2574

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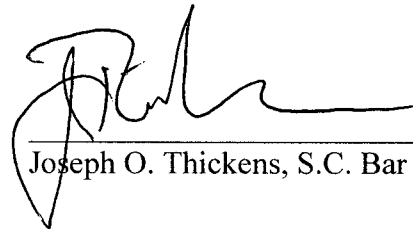
v.

Norfolk Southern Railroad Company,

Appellee.

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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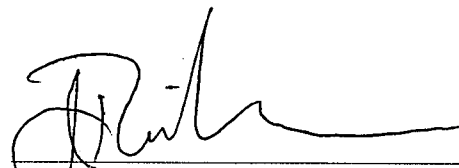
Norfolk Southern Railroad Company,

Appellee.

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, be depositing a copy of it in the United States Mail, postage prepaid on November 18, 2019, addressed to the following:

Ronald K. Wray, II
James A. Bradshaw
GALLICAN, WHITE & BOYD, P.A.
PO Box 10589
Greenville, SC 29603
Attorneys for Respondent



Joseph O. Thickens, S.C. Bar No. 101398
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Attorneys for Appellant

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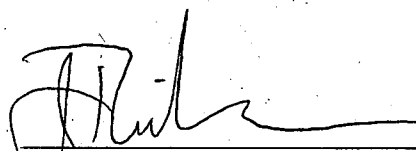
Norfolk Southern Railroad Company,

Respondent.

PROOF OF SERVICE

I certify that I have caused the service of Appellant's Initial Brief on Respondent by depositing a copy of it in the United States Mail, postage prepaid on November 18, 2019, addressed to the following:

Ronald K. Wray, II
James A. Bradshaw
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PO Box 10589
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Attorneys for Appellant

November 18, 2019

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SC Court of Appeals

Via Hand Delivery

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

RE: Michael Collins v. Norfolk Southern Corporation
Appellate Case No.: 2019-000984

Dear Ms. Kitchings:

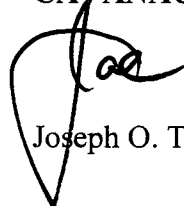
Please find enclosed the original and one (1) copy of the following:

1. Appellants' Initial Brief;
2. Appellants' Designation of Matter to be Included in the Record on Appeal.

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

Yours truly,

CAYANAUGH & THICKENS, LLC



Joseph O. Thickens

JOT/

cc:

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Attorneys for Respondent