

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maite D. Murphy, Circuit Court Judge

Case No. 2016-CP-18-1001
Appellate Case No. 2019-000671

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DEC 06 2019
SC Court of Appeals

Tammy C. Richardson.....Respondent,

v.

Halcyon Real Estate Services, LLP and
McCabe, Trotter & Beverly, P.C.

Of whom McCabe, Trotter, & Beverly, P.C. isAppellant.

**RESPONDENT'S DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

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

1. Order Dated April 4, 2019
Re: Granting of Plaintiff's Motion for Sanctions for
Deposition Misconduct and Denying Defendant's
Motion for Protection regarding the depositions of Self
and Gatling.

2. Order Dated April 26, 2019
Re: Denial of MTB's Motion for Reconsideration.
3. Order Dated August 2, 2019 Appellate Case No. 2019-000675
Re: Denial of Petitioner McCabe Trotter & Beverly,
P.C.'s Petition for Writ of Certiorari to the Supreme
Court of South Carolina.
4. Amended Answer and Counterclaim and Third Party Complaint filed
October 29, 2015.
5. Answer to Third Party Complaint of McCabe Trotter & Beverly, PC
filed December 21, 2015.
6. Plaintiff Tammy Richardson's Motion for Sanctions filed February 7,
2019.
 - i. Ex. 1 – Stephanie Trotter Depo dated Jan. 17, 2017, p. 167;
 - ii. Ex. 2 - Sheri Self Depo dated Jan. 24, 2019, pp. 1-230;
 - iii. Ex. 3 - Haylen Gatling Depo dated Jan. 15, 2019, pp. 1-295;
and
 - iv. Ex. 4 - Email with David Nelson dated July 18, 2018,
Georgia Counsel.
7. Letter of counsel for Richardson dated April 2, 2019 filed with the
Court 2:52 p.m.
8. Transcript of Motion Hearing of March 4, 2019, pp. 79 to 107.
9. Videotaped footage of deposition of Sheri Self dated January 24, 2019.
10. Videotaped footage of deposition of Haylen Gatling dated January 15,
2019.

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

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Charleston, South Carolina

December 5, 2019

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**Appeal from Dorchester County
Court of Common Pleas
Hon. Maite Murphy, Circuit Court Judge**

Case No. 2016-CP-18-1001

Tammy C. Richardson, Respondent,

v.

Halcyon Real Estate Services, LLP and McCabe, Trotter & Beverly, P.C.

Of whom McCabe, Trotter & Beverly, P.C. is the Appellant.

Appellate Case No. 2019-000671

PROOF OF SERVICE

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**Attorneys for Respondent
Tammy C. Richardson**

Charleston, SC
December 5, 2019

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I, Justin S. Kahn, do hereby affirm that on December 5, 2019, I served one copy of Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal, on the following below named individuals by placing a copy in the United States Mail, first class, postage prepaid:

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ELLIS I. KAHN*[^]
JUSTIN S. KAHN*[^]
WES B. ALLISON

December 5, 2019

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Tammy C. Richardson v. McCabe, Trotter & Beverly, P.C.
Appellate Case No.: 2019-000671

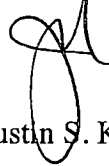
Dear Ms. Kitchings:

Enclosed for filing is an original and one copy of Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal, along with Proof of Service. By copy of this letter I am serving these documents on counsel for Appellant.

Please file the original copy, mark the extra copy filed and return it to us in the enclosed, postage-prepaid envelope.

With best regards, I am

Yours sincerely,



Justin S. Kahn

JSK/pm

Encl.

cc: M. Dawes Cooke, Jr., Esq.
Robert P. Woods, Esq.
Joshua R. Hinson, Esq.

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* SOUTH CAROLINA AND DISTRICT OF COLUMBIA

[^] BOARD CERTIFIED BY THE NATIONAL BOARD OF TRIAL ADVOCACY IN CIVIL TRIAL ADVOCACY AND
THE AMERICAN BOARD OF PROFESSIONAL LIABILITY ATTORNEYS IN MEDICAL MALPRACTICE



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