

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master-In-Equity

Case No. 2017-CP-46-2574

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DEC 20 2019
SC Court of Appeals

Michael Collins,

Appellant,

v.

Norfolk Southern Corporation,

Respondent.

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

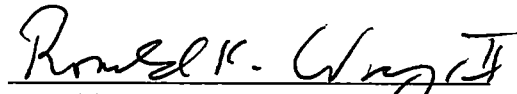
In addition to documents designated by Appellant, Respondent proposes the following be included in the Record on Appeal:

- 1 Norfolk Southern's Answer filed October 12, 2017
- 2 Norfolk Southern's Notice of Motion and Motion for Summary Judgment filed August 6, 2018
- 3 Norfolk Southern's Memorandum in Support of Its Motion for Summary Judgment filed November 9, 2018
- 4 Collins' Memorandum in Opposition to Norfolk Southern's Motion for Summary Judgment filed November 14, 2018
- 5 Collins' Motion to Alter/Amend filed April 4, 2019
- 6 Deposition of Michael Collins
- 7 Exhibits 1, 2, 3, 4, 5, 7, and 10 to Deposition of Michael Collins

(Signature Page to Follow)

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

December 18, 2019



Ronald K. Wray, II (S.C. Bar #65246)

James A. Bradshaw (S.C. Bar #100548)

GALLIVAN, WHITE & BOYD, P.A.

55 Beattie Place, Suite 1200

P.O. Box 10589

Greenville, SC 29603

Telephone: (864) 271-5362

Facsimile: (864) 271-7502

Attorneys for Respondent,
Norfolk Southern Corporation

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PROOF OF SERVICE

The undersigned, an attorney in this matter for the Respondent, Norfolk Southern Corporation, certifies that I have this 18th day of December, 2019, served copies of Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal upon counsel for the Appellant by causing them to be deposited in the United States Mail, first-class postage prepaid, addressed to:


Joseph O. Thickens
J. Eric Cavanaugh
Cavanaugh & Thickens, LLC
Post Office Box 2409
Columbia, SC 29202

AND

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

Attorneys for Appellant

December 18, 2019


Ronald K. Wray, II (S.C. Bar #65246)
James A. Bradshaw (S.C. Bar #100548)
GALLIVAN, WHITE & BOYD, P.A.
55 Beattie Place, Suite 1200
P.O. Box 10589
Greenville, SC 29603
Telephone: (864) 271-5362
Facsimile: (864) 271-7502

Attorneys for Respondent,
Norfolk Southern Corporation

December 18, 2019

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

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Re: Michael Collins v. Norfolk Southern Corporation SC Court of Appeals
Appellate Case No.: 2019-000984

Dear Ms. Kitchings:

Please find enclosed the original and one (1) copy of Initial Brief of Respondent, Respondent's Designation of Matter to be Included in the Record on Appeal, and Proof of Service of same.

I would appreciate if you would file the originals and return the remaining clocked copies in the self-addressed, stamped envelope. By copy of this letter, counsel for Appellant is also hereby served with a copy of these documents.

With kind regards, I am

Sincerely,

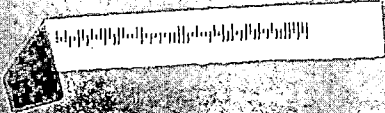
GALLIVAN, WHITE & BOYD, P.A.

Ronald K. Wray, II

Ronald K. Wray, II

RKW/meb
Enclosures

cc: Joseph O. Thickens, Esq. (w/enclosures)
J. Eric Cavanaugh, Esq. (w/enclosures)
Charles E. Sorey, II, Esq. (w/enclosures)



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GALLIVAN WHITE BOYD
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Greenville, South Carolina 29601

The Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
P.O. Box 11629 (29211)
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