

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM DORCHESTER COUNTY
In the Court of Common Pleas for the Ninth Circuit

JAN 13 2020

The Honorable Maite Murphy, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2019-000671

Tammy C. RichardsonRespondent,

v.

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

Of whom McCabe, Trotter & Beverly, P.C. is theAppellant.

**APPELLANT'S REPLY DESIGNATION OF MATTER FOR
INCLUSION IN THE RECORD ON APPEAL**

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***Counsel for Appellant McCabe, Trotter &
Beverly, P.C.***

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Appellant McCabe, Trotter & Beverly, P.C. (“MTB”) hereby designates the following materials to be included in the Record on Appeal in this matter in connection with its Appellant’s Reply Brief. Unless otherwise expressly stated, each item designated is to include all attachments or exhibits to the original of the referenced item. MTB intends to designate each and every item from the record that it cited in its Initial Reply Brief of Appellant in this matter. MTB expressly reserves the right to seek supplementation of the record pursuant to Rules 209 and 212, SCACR. MTB designates the following matters for inclusion in the Record on Appeal:

1. February 7, 2019 Plaintiff’s Motion for Sanctions and Memorandum in Support Thereof Concerning Improper Deposition Conduct of MTB Counsel

Exhibit 2 (Self Deposition), at 24

Exhibit 3 (Gatling Deposition), at 186, 199-200, 221
2. April 2, 2019 Order Granting Pl.’s Mot. for Sancts. for Depo. Misconduct and Denying Def.’s Mots. for Protection (Self)
3. June 28, 2019 Order

MTB certifies, pursuant to S.C.A.C.R., Rule 209(c), that the designations set forth above are relevant to the appeal in this matter, and that it has not designated any matter that is irrelevant to the issues before the Court.

January 20, 2020

BARNWELL WHALEY PATTERSON &
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By: 

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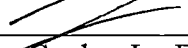
PROOF OF SERVICE

I certify that I have served the Appellant McCabe, Trotter & Beverly, P.C.'s Reply Designation of Matter for Inclusion in the Record on Appeal on the above-referenced Respondent by depositing a copy of it in the United States Mail, postage prepaid, on January 10, 2020, addressed to her attorneys of record:

Mary Leigh Arnold, Esq.
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749 Johnnie Dodds Boulevard
Mount Pleasant, South Carolina 29464

Justin Kahn, Esq.
Kahn Law Firm, LLP
562 Savannah Highway
Charleston, South Carolina 29407

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January 10, 2020

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

**RE: Tammy C. Richardson v. Halcyon Real Estate Services, LLP
and McCabe, Trotter & Beverly, PC**
Appellate Case No: 2019-000671
Our Matter No. 2116.160

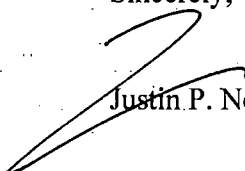
Dear Ms. Kitchings:

Please find enclosed for filing an original and one copy of each of the following:

- (1) Initial Reply Brief of Appellant;
- (2) Appellant's Reply Designation of Matter for Inclusion in the Record on Appeal; and
- (3) Proofs of Service.

Please file the originals and return clocked copies to me in the enclosed envelope. By copy of this letter, I am serving a copy of the Initial Reply Brief and Designation upon counsel of record.

Sincerely,


Justin P. Novak

JPN/jgc
Enclosures

cc: Justin S. Kahn, Esquire
Mary Leigh Arnold, Esquire
Robert P. Wood, Esquire

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2116.160
The Honorable Jenny Abbott Kitchings
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