

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Alison Renee Lee, Circuit Court Judge

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Appellate Case No. 2019-000566  
Case No. 2016-CP-40-0387

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**RECEIVED**  
JAN 22 2020  
SC Court of Appeals

Sammie L. Goodwin,..... Appellant,

v.

Richland County Sheriff Department, Richland County  
Sheriff Leon Lott in his official capacity, ..... Respondents.

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

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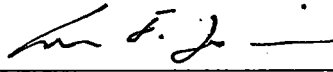
The Respondents Richland County Sheriff Department and Richland County Sheriff Leon Lott propose that the following be included in the Record on Appeal:

- (1) Order of Circuit Court Judge Alison Lee filed May 16, 2018
- (2) Order of Circuit Court Judge Alison Lee filed March 21, 2019
- (3) Order of Circuit Court Judge Alison Lee filed August 30, 2017
- (4) Order of Circuit Court Judge George McFaddin filed June 7, 2017

- (5) Complaint
- (6) Answer
- (7) Defendants' Motion to Compel, filed March 13, 2017, with all exhibits
- (8) Defendants' Motion to Dismiss for Failure to Prosecute, filed August 14, 2017
- (9) Defendants' Memorandum in Support of Motion to Dismiss for Failure to Prosecute, filed August 14, 2017, with all exhibits
- (10) Defendants' Renewed Motion to Dismiss, filed January 26, 2018
- (11) Plaintiff's Deposition, with exhibits
- (12) Deposition of Mickey Plymale, M.D., with exhibits
- (13) Copies of MRI Patient Medical History Screening Forms submitted at March 28, 2018 hearing
- (14) Plaintiff's Motion to Reconsider filed March 18, 2019
- (15) Transcript of June 6, 2017 Motion Hearing
- (16) Transcript of August 30, 2017 Motion Hearing
- (17) Transcript of March 28, 2018 Motion Hearing

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

LINDEMANN, DAVIS & HUGHES P.A.

BY: 

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-and-

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*Counsel for Respondents*

January 17, 2020

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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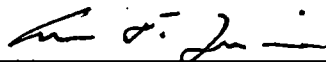
**CERTIFICATE OF SERVICE**

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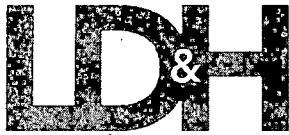
The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Respondents, does hereby certify that service of **Initial Brief of Respondents** and **Respondents' Designation of Matter to be Included in the Record on Appeal** was made upon the *pro se* Appellant and all other counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 17th day of January 2020:

Mr. Sammie L. Goodwin  
317 Saddlefield Road  
Columbia, South Carolina 29203

Robert D. Garfield, Esquire  
Crowe LaFave, LLC  
Post Office Box 1149  
Columbia, South Carolina 29202



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January 17, 2020

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*\*Also Admitted in North Carolina  
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*Of Counsel*

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

RE: Sammie L. Goodwin v. Richland County Sheriff Department, Richland County Sheriff  
Leon Lott in his official capacity  
Appellate Case Number: 2019-000566  
Civil Action Number: 2016-CP-40-0387  
Claim Number: Risk Management  
Our File Number: 314.20152

Dear Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the **Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. Please find the originals and returned a clocked-in copy of each document to me in the enclosed envelope.

By copy of this letter, I am serving copies on the *pro se* Appellant and all other counsel of record. If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosures

**RECEIVED**  
JAN 22 2020  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
November 6, 2019  
Page Two

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cc: (w/ Enclosures)

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