

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No.: 2019-001722

RECEIVED

JAN 30 2020

SC Court of Appeals

Bridgett FowlerAppellant

v.

FedEx Ground Package System, Inc. and James K. Ard d/b/a JMK Logistics
Corporation Respondents

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

TURNER & CAUDELL, LLC

Tyler R. Turner, S.C. Bar No. 78447
Mary Allison Caudell, S.C. Bar No. 101187

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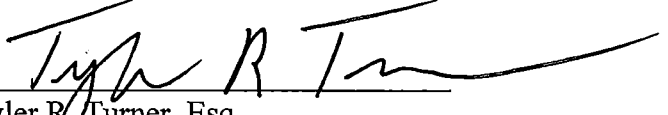
914 Richland Street, Suite A-101
Columbia, South Carolina 29201
(803) 898-9708

Attorneys for Appellant Bridgett Fowler

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

- (1) Plaintiff's Summons and Second Amended Complaint dated March 4, 2019;
- (2) Defendant FedEx Ground Package System, Inc.'s Answer to Plaintiff's Second Amended Complaint dated March 15, 2019;
- (3) Defendant James K. Ard d/b/a JMK Logistics Corporation's Answer to the Second Amended Complaint dated June 3, 2019;
- (4) Defendant's Motion for Summary Judgment and Memorandum in Support of Motion for Summary Judgment dated August 1, 2019;
- (5) Plaintiff's Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment dated August 29, 2019;
- (6) Transcript of Record Before The Honorable Benjamin H. Culbertson Dated September 11, 2019; and
- (7) Order Granting Defendant's Motion for Partial Summary Judgment dated September 23, 2019.

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


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January 30, 2020

Columbia, South Carolina

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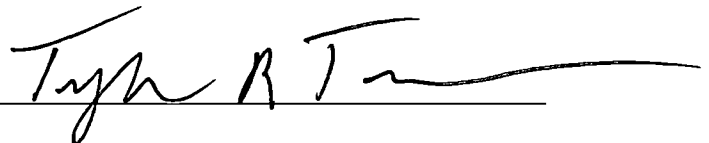
PROOF OF SERVICE

We hereby certify that we have served the Respondents, FedEx Ground Package System, Inc. and James K. Ard d/b/a JMK Logistics Corporation, the Appellant's Designation of Matter to be Included in the Record on Appeal in the above-captioned matter by electronic mail and U.S. Mail on January 30, 2020 to the below-named parties at their address of record:

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By: _____



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Attorneys for Appellant Bridgett Fowler

Columbia, South Carolina
January 30, 2020

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VIA HAND DELIVERY

The Honorable V. Claire Allen, Chief Deputy Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

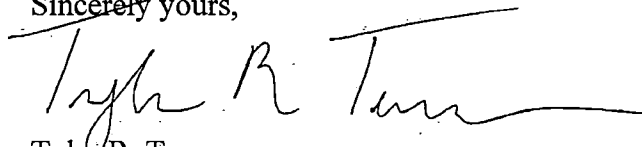
Re: Bridgett Fowler v. FedEx Ground Package System, Inc. and James K. Ard
d/b/a JMK Logistics Corporation
C.A. No. 2018-CP-26-06173

Dear Ms. Allen:

Enclosed for filing please find the original and one (1) copy of Appellant's Initial Brief and Designation of Matter. Please return the clocked in copy with our courier. By copy of this letter, we are today serving a copy of Appellant's Initial Brief and Designation of Matter on counsel for Respondent.

With kind regards, I am

Sincerely yours,



Tyler R. Turner

tturner@turnercaudell.com

/sws

Enclosures

c : Dominic Starr, Esq. (w/enclos.)
Abby Sauders, Esq. (w/enclos.)
Mary Allison Caudell, Esq. (w/enclos.)