

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas
Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

JAN 31 2020

Appellate Case No. 2019-001286

SC Court of Appeals

Lower Court Case No. 2017-CP-26-08184

Jane Doe.....Appellant,

v.

Crazy Horse Saloon & Restaurant, Inc. d/b/a
Thee New Dollhouse and Dog Leg Right, LLCRespondent.

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

Respondent Crazy Horse Saloon & Restaurant, Inc. d/b/a Thee New Dollhouse and Dog Leg Right, LLC designates the following matter to be included in the Record on Appeal:

1. Circuit Court's Order Denying Plaintiff's Rule 59(e) Motion dated July 23, 2019;
2. Circuit Court's Order Granting Motion for Summary Judgment dated May 6, 2019;
3. Circuit Court's Order Setting Aside Entry of Default dated May 16, 2018;
4. Clerk of Court's Entry of Default dated February 23, 2018;
5. Circuit Court's Order Granting Plaintiff's Request to Proceed as Jane Doe dated December 15, 2017;
6. Plaintiff's Rule 59(e) Motion dated May 16, 2019;
7. Plaintiff's Memorandum in Opposition to Summary Judgment dated April 1, 2019;
8. Defendant's Memorandum in Support of Summary Judgment and All Exhibits dated April 4, 2019;
9. Defendant's Motion for Summary Judgment dated February 26, 2019;
10. Defendant's Answer dated April 12, 2018;
11. Defendant's Motion to Vacate Default Judgment dated March 22, 2018;
12. Plaintiff's Motion for Default Judgment and Exhibits dated February 22, 2018;
13. Plaintiff's Complaint dated December 12, 2017;

14. Plaintiff's Affidavits of Service filed December 27, 2017;
15. Complete Transcript of Circuit Court's Hearing on Plaintiff's Rule 59(e) Motion dated July 23, 2019;
16. Complete Transcript of Circuit Court's Hearing on Defendant's Motion for Summary Judgment dated April 3, 2019;
17. Complete Transcript of Circuit Court's Hearing on Defendant's Motion to Vacate Default dated May 15, 2018;
18. Deposition Transcript of Plaintiff Jane Doe at pp. 21, 24-25 & 36; and
19. Deposition Transcript of James McNamee at pp. 39, 57-59.

Pursuant to Rule 209(c), SCACR, the undersigned counsel certify that this designation contains no matter that is irrelevant to this appeal.

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: 

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*Attorneys for Respondent Crazy Horse Saloon &
Restaurant, Inc. d/b/a Thee New Dollhouse and
Dog Leg Right, LLC*

Columbia, South Carolina
January 31, 2020

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**PROOF OF SERVICE OF
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

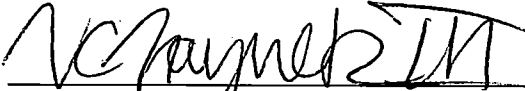
I, the undersigned, of the law offices of Robinson Gray Stepp & Laffitte, LLC, attorneys for Respondent, do hereby certify that I have served counsel in this action with a copy of the Designation of Matter to be Included in the Record on Appeal by mailing a copy of same to counsel via United States Mail, postage prepaid, at the following address(es):

Counsel Served:

William J. Luse, Esquire
SC Bar No.: 72790
916 Broadway Street
Myrtle Beach, SC 29577

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: 

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Columbia, South Carolina
January 31, 2020



ROBINSON
GRAY

Litigation + Business

January 31, 2020

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JAN 31 2020

VIA HAND DELIVERY SC Court of Appeals

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

RE: Jane Doe v. Crazy Horse Saloon & Restaurant, Inc. d/b/a
Thee New Dollhouse and Dog Leg Right, LLC
SC Court of Appeals Case No. 2019-001286
Our File No. 7509-1500

Dear Ms. Kitchings:

I enclose for filing the originals and one copy each of the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal in the above-reference matter. Please return a clocked-in copy of each to me for my file.

By copy of this letter I am serving a copy of same upon counsel for the Appellant, William J. Luse, Esquire. With highest regards, I am,

Very truly yours,

Vordman Carlisle Traywick, III

VCT:rco
Enclosure

cc: William J. Luse, Esquire
William Monckton, VI, Esquire