

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

**RECEIVED**  
FEB 06 2020  
SC Court of Appeals

Case No. 2019-001536

Lower Court Case No. 2019-CP-07-00433

Viola M. Hackworth, as Personal Representative of the Estate of Eugene Boles a/k/a Eugene N. Boles, deceased, .....Respondent,

v.

Bayview Manor, LLC d/b/a Bayview Manor, Epic Mgt, LLC, Epic Group, Limited Partnership, Teddie Simmons, John Does, and Richard Roe Corporations, .....Appellants.

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

Respondent proposes the following to be included in the Record on Appeal:

1. Pleadings:
  - a. If not included with Appellants’ Designation of Matter, a filed copy of Respondent’s Complaint for Damages dated March 1, 2019, including Exhibit C (Affidavit of Mary Ann Hewston, MPM, BSN, RN, NHA);
  - b. Filed Respondent’s Motion to Conduct Limited Discovery dated April 30, 2019;
  - c. Filed copy of Respondent’s Response in Opposition to Appellants’ Motion to Stay Action and Compel Arbitration; in the Alternative Motion for Nonjury Trial; and Motion for Protective Order dated June 6, 2019, including Exhibits 1 (and its Attachments A and B), 2, and 3;
  - d. Filed copy of Respondent’s Response in Opposition to Appellants’ Motion to Alter or Amend dated August 10, 2019.

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

Dated: February 3<sup>rd</sup>, 2020



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A. Keith McAlister, Jr., SC Bar No. 78213

C. Caleb Connor, SC Bar No. 100517

Kenneth L. Connor, SC Bar No. 100298

CONNOR & CONNOR, LLC

302 Park Avenue SE

Aiken, South Carolina 29801

P: (803) 226-0543

F: (800) 480-9715

Email: kip@theconnorfir.com

*Attorneys for Respondent*

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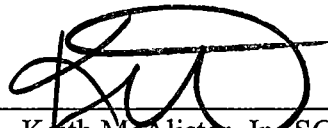
v.

Bayview Manor, LLC d/b/a Bayview Manor, Epic Mgt, LLC, Epic Group, Limited Partnership, Teddie Simmons, John Does, and Richard Roe Corporations,.....Appellants.

**PROOF OF SERVICE**

I certify that this the 3<sup>rd</sup> day of February, 2020, I have caused to be served a copy of the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal upon Appellants Bayview Manor, LLC d/b/a Bayview Manor, Epic Mgt, LLC, Epic Group, Limited Partnership, Teddie Simmons, John Does, and Richard Roe Corporations, causing a copy of same to be deposited in the United States mail, postage prepaid, addressed as follows:

A. Walker Barnes  
Holcombe Bomar, P.A.  
P.O. Box 1897  
Spartanburg, South Carolina 29304  
*Attorney for Appellants*

  
A. Keith McAlister, Jr., SC Bar No. 78213  
C. Caleb Connor, SC Bar No. 100517

Kenneth L. Connor, SC Bar No. 100298  
CONNOR & CONNOR, LLC  
302 Park Avenue SE  
Aiken, South Carolina 29801  
P: (803) 226-0543  
F: (800) 480-9715  
Email: kip@theconnorfir.com

*Attorneys for Respondent*

# CONNOR & CONNOR, LLC

TRIAL LAWYERS

www.TheConnorFirm.com

February 3, 2020

**Via U.S. Mail**

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

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SC Court of Appeals

Re: *Viola M. Hackworth, as Personal Representative of the Estate of Eugene Boles a/k/a Eugene N. Boles, deceased v. Bayview Manor, LLC d/b/a Bayview Manor, Epic Mgt, LLC, Epic Group, Limited Partnership, Teddie Simmons, John Does, and Richard Roe Corporations*  
Court of Appeals Appellate Case No. 2019-001536

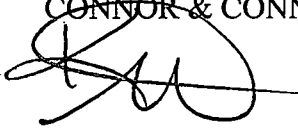
Dear Ms. Kitchings:

Please find enclosed one original and one copy of the Initial Brief of Respondent and the Respondent's Designation of Matter to be Included in the Record on Appeal. Please file the originals and return the copie to our office in the self-addressed stamped envelope provided.

If you have any questions or concerns, please do not hesitate to contact me.

Kind Regards,

CONNOR & CONNOR, LLC



A. Keith McAlister, Jr.

cc: A. Walker Barnes



**CONNOR & CONNOR, LLC**  
TRIAL LAWYERS  
302 PARK AVENUE SE  
AIKEN, SOUTH CAROLINA 29801

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