

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
FEB 25 2020  
SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Edgar W. Dickson, Circuit Court Judge

Case No. 2019-CP-07-00433  
Appellate Case No. 2019-001536

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.

---

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

---

Appellants submit this Designation of Matter in conjunction with the filing of their Initial Reply Brief. Appellants propose to include within the Record on Appeal all documents identified within their Designation of Matter filed contemporaneously within Appellants' Initial Brief. Appellants additionally propose to include the following within the Record on Appeal:

1. 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; and
2. Respondent's Response in Opposition to Appellants' Motion to Alter or Amend dated August 10, 2019.



THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Edgar W. Dickson, Circuit Court Judge

Case No. 2019-CP-07-00433  
Appellate Case No. 2019-001536

**RECEIVED**  
FEB 25 2020  
SC Court of Appeals

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.

---

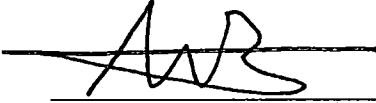
**PROOF OF SERVICE**

---

The undersigned hereby certifies that on the 24<sup>th</sup> day of February, 2020, he has served  
counsel for Respondent with a copy of **APPELLANTS' DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL** in this matter by mailing copies of the same by  
United States mail, postage prepaid, to the following addresses:

C. Caleb Connor, Esq.  
Kenneth L. Connor, Esq.  
A. Keith McAlister, Jr., Esq.  
Anne K. Moore, Esq.  
CONNOR & CONNOR, LLC  
302 Park Avenue, SE  
Aiken, South Carolina 29801  
*Attorneys for Respondent*

HOLCOMBE BOMAR, P.A.  
P.O. Box 1897  
Spartanburg, SC 29304  
(864) 594-5300

By:   
A. Walker Barnes (S.C. Bar No. 78485)  
*Attorneys for Appellants*



# Holcombe Bomar, P.A.

101 W. St. John Street, Suite 200,  
Spartanburg, SC 29306

P.O. Box 1897  
Spartanburg, SC 29304

phone (864) 594-5300  
fax (864) 585-3844

Direct Dial: (864) 594-5308

[www.holcombebomar.com](http://www.holcombebomar.com)

[wbarnes@holcombebomar.com](mailto:wbarnes@holcombebomar.com)

William U. Gunn  
Koger M. Bradford  
Perry D. Boulier  
William B. Darwin, Jr.  
W. McElhaneey White  
A. Todd Darwin  
Joshua T. Thompson  
A. Walker Barnes  
Todd R. Flippin  
Ayla Luers Connor  
Konstantine S. Diamaduros  

---

Neville Holcombe, 1902-1983  
Horace L. Bomar, 1912-1994

February 24, 2020

**VIA FEDERAL EXPRESS**

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

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 (C.A. No. 2019-CP-07-00433)  
**Appellate Case No. 2019-001536**  
Our File No. 15378

Dear Ms. Kitchings:

Please find enclosed for filing in the above case, the following:

- (1) One (1) original and one (1) copy of Appellants' Initial Reply Brief;
- (2) One (1) original and one (1) copy of the Proof of Service of the same;
- (3) One (1) original and one (1) copy of Appellants' Designation of Matter to be Included in the Record on Appeal; and
- (4) One (1) original and one (1) copy of the Proof of Service of the same.

Please do not hesitate to contact me if you have any questions or concerns. Otherwise, please file the originals of the Initial Reply Brief, Proof of Service for the same, Designation of Matter, and Proof of Service for the same, and return to me the clocked copies of the same via the self-enclosed, stamped envelope. By copy of this letter and enclosures, I am hereby serving other counsel of record with the enclosed filings.

Sincerely,

A. Walker Barnes

cc: C. Caleb Connor, Esq. (*Via First Class Mail*)  
Kenneth L. Connor, Esq. (*Via First Class Mail*)  
A. Keith McAlister, Jr., Esq. (*Via First Class Mail*)  
Anne K. Moore, Esq. (*Via First Class Mail*)

**RECEIVED**  
FEB 25 2020  
SC Court of Appeals

ORIGIN ID:SPAA (864) 594-5308  
A. WALKER BARNES  
HOLCOMBE BOMAR, P.A.  
101 W. ST. JOHN STREET  
SUITE 200  
SPARTANBURG, SC 29306  
UNITED STATES US

SHIP DATE: 24FEB20  
ACTWGT: 0.50 LB  
CAD: 1424755/INET4220

BILL SENDER

TO: THE HON. JENNY ABBOTT KITCHINGS  
CLERK, SC COURT OF APPEALS  
GROUND FLOOR, 1220 SENATE STREET

COLUMBIA SC 29201

(803) 734-1890

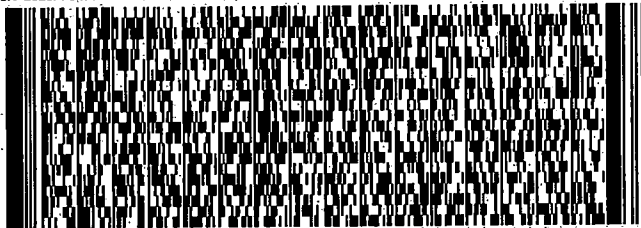
REF: BOLES/15378

INV:  
PO:

DEPT:

56B12049EFE4A

FedEx Ship Manager - Print Your Label(s)



FedEx  
Express



201202191010

TUE - 25 FEB 10:30A  
PRIORITY OVERNIGHT

TRK# 7778 4755 2148  
0201

XH USCA

29201  
SC-US CAE



RECEIVED

FEB 25 2020

SC Court of Appeals

2/24/2020