

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2010-CP-08-3732

Jane Roe, as parent and natural guardian of
Judy Roe, James Roe, and Joyce Roe, minor
children under the age of eighteen (18).....Appellants,

v.

Daniel Bibby, Sr., and Michelle Bibby

Of whom, Michelle Bibby is.....Respondent.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the record on appeal:

1. Summons and Complaint;
2. Answer of Defendant Michelle Bibby;
3. Defendant Michelle Bibby's Response to Requests for Admission;
4. Deposition of Jane Roe;
5. Deposition of Michelle Bibby;
6. Statement of Daniel Bibby, Jr. (Exhibit A to Michelle Bibby Dep.);
7. Dorchester Children's Center Interview Report (Exhibit B to Michelle Bibby Dep.);
8. Deposition of Michelle Bernadette Quattlebaum
9. Motion for Summary Judgment
10. Plaintiffs' Memorandum in Opposition to Summary Judgment
11. Plaintiffs' Supplemental Memorandum in Opposition to Summary Judgment
12. Transcript of Summary Judgment Hearing of July 10, 2012
13. Order Granting Summary Judgment

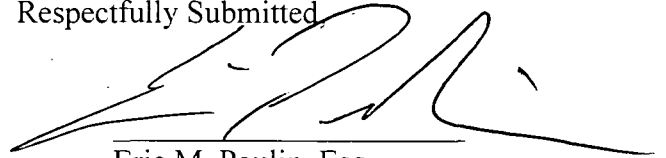
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FEB 27 2013

SC Court of Appeals

Respectfully Submitted

A handwritten signature in black ink, appearing to read 'E. Poulin', written over a horizontal line.

Eric M. Poulin, Esq.
S.C. Bar No.: 100209
Anastopoulo Law Firm, LLC
2557 Ashley Phosphate Road
North Charleston, SC 29418
(843) 614-8888

February 25, 2013

Attorney for Appellants

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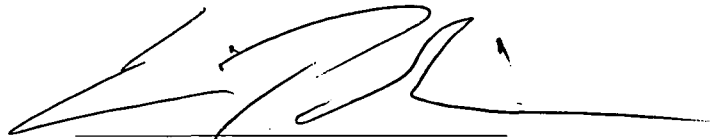
Daniel Bibby, Sr., and Michelle Bibby

Of whom, Michelle Bibby is.....Respondent.

PROOF OF SERVICE

I certify that I have served Appellant's Initial Brief and Designation of Matter on Michelle Bibby by depositing a copy of it in the United States Mail, postage prepaid, on February 25, 2013, addressed to her attorney of record, Eugene P. Corrigan, III, Post Office Box 547, Charleston, South Carolina, 29402.

February 25, 2013



Eric M. Poulin, Esq.
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SOUTH CAROLINA COURT OF APPEALS

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Catherine F. Juhas (NC) (SC)

Florence Office: 150 W. Evans Street, Florence, SC

Reply to the North Charleston Office

February 25, 2013

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

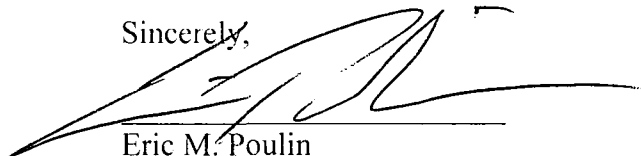
RE: *Jane Roe v. Michelle Bibby*
Case No.: 2010-CP-08-3732
Tracking No.: 2012-213350

Dear Ms. Kitchings:

Please find enclosed an original and one (1) copy of Appellants' Initial Brief; original and one (1) copy of Appellants' Designation of Matter to be Included in the Record on Appeal; and original and one (1) copy of proof of service of the same upon the Respondent. We would greatly appreciate it if you would file the originals and return the clocked in copies to us through the enclosed envelope.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Eric M. Poulin
2557 Ashley Phosphate Road
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Cc: Eugene P. Corrigan, III (w/ enclosures)
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ADDITIONAL OFFICES

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