

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM LAURENS COUNTY

Donald B. Hocker, Circuit Court Judge

Appellate Case No.: 2019-001514

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MAR 09 2020
SC Court of Appeals

Martha Foster Watts Appellant,

v.

Ricky W. Chastain, Sheriff Laurens County, South Carolina Respondent.

Appellant's Designation of Matter to be Included in the Record on Appeal

Appellant designates the following matter to be included in the record on appeal:

ORDERS AND JUDGMENT

- | | | |
|---------------------|---------------------------------------|-----------|
| 1. April 20, 2018 | Judgment form (unserved) with Verdict | (4 pages) |
| 2. August 6, 2019 | Order Denying mot. for new trial | (6 pages) |
| 3. February 7, 2020 | Order of Ct. App. granting P's MEXT | (1 page) |

PLEADINGS

- | | | |
|-----------------------|-----------------------------|-----------|
| 4. August 13, 2015 | Summons and Complaint | (4 pages) |
| 5. September 14, 2015 | Answer to Complaint | (4 pages) |
| 6. December 17, 2015 | Amended Complaint | (3 pages) |
| 7. January 14, 2016 | Answer to Amended Complaint | (5 pages) |

TRANSCRIPTS

- | | | |
|-----------------------|-------------------------------|-------------|
| 8. August 16-19, 2018 | Trial Transcript | (451 pages) |
| 9. December 19, 2018 | Post-trial Hearing Transcript | (24 pages) |

EXHIBITS

10. April 17, 2018	P's [Trial] Ex. 1, Sheriff's Incident Report	(1 page)
11. April 17, 2018	P's [trial] Ex. 3 (Holmes interview by Duncan)	(17 pages)
12. April 19, 2018	D's [trial] Ex. 6– video (placeholder page noting exhibit is to be submitted by the Clerk of Court	(1 page)

for Laurens County)

MOTIONS, RESPONSES & MEMORANDA

13. April 18, 2018	P's memo supporting [oral] mot. to suppress video (with attachments)	(18 pages)
14. April 18, 2018	P's memo supporting [oral] mot. in limine	(14 pages)
15. April 27, 2018	P's motion for new trial	(3 pages)
16. June 21, 2018	D's response opposing new trial	(9 pages)
17. February 6, 2019	D's memo opposing new trial	(15 pages)
18. April 2, 2019	P's supplemental memo supporting new trial	(5 pages)

OTHER MATERIALS

Pre-trial Correspondence

19. April 4, 2018	Harter letter to Thompson, with attached markup re: Holmes video dep.	(7 pages)
20. April 9, 2018	Email Thompson to Harter	(1 page)
21. April 10, 2018	Harter letter to Thompson	(1 page)
22. April 11, 2018	Email Thompson to Harter with attached markup re: Holmes video dep.	(8 pages)

De Bene Esse Evidence

23. March 16, 2018	Unredacted Holmes de bene esse dep.	(81 pages)
24. April 17, 2018	Holmes video dep placeholder page noting video submitted by Laurens County Clerk of Court	(1 page)

In the Court of Appeals

25. September 5, 2019	Notice of Appeal (without attachments)	(1 page)
26. September 24, 2019	Transcript request	(2 pages)
27. September 26, 2019	Agreement of counsel as to Transcript	
28. December 31, 2019	Amended Notice of Appeal	
29. January 2, 2020	Additional transcript request	(1 page)
30. February 2, 2020	MEXT re Appellant's Initial Brief	(2 pages)

Undersigned counsel for Appellant certifies that this Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted this 5th day of March 2020.

Thomas J. Thompson
Townsend & Thompson
Registered Limited Liability Partnership
210 West Laurens Street
P.O. Box 215
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Attorneys for Appellant

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM LAURENS COUNTY

Donald B. Hocker, Circuit Court Judge

Appellate Case No.: 2019-001514

PROOF OF SERVICE

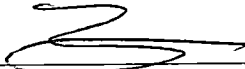
I certify that I have served the Appellant's Designation of Matter on Respondent Ricky W. Chastain, Sheriff Laurens County, South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on March 5, 2020, addressed to their attorneys as follows:

Attorneys of record:

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Post Office Box 10224
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Attorneys for Respondent


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March 5, 2020

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

RE: **Martha Foster Watts v. Ricky W. Chastain, Sheriff Laurens County, South Carolina**
(2019-001514)

Dear Ms. Kitchings:

You will find enclosed the Appellant's Initial Brief and Appellant's Designation of Matter to be included in the Record on Appeal and Proof of Service on Respondent's Attorneys of record.

Sincerely,



Thomas J. Thompson
Post Office Box 215
Laurens, South Carolina 29360
(864) 984-6554
Attorney for the Appellant

TJT/cav

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