

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

RECEIVED

MAR 17 2020

~~Court of Appeals~~

Appellate Case No. 2019-001609

Rachel Farley, as Trustee of the Louise Farley Revocable Trust Dated February 8, 2005;
Drummond B. Farley; Rachel R. Farley; Carol E. Farley; and Nancy E. Farley, Appellants,

v.

Church of the Harvest of Columbia, Inc., Respondent.

COUNTERDESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL

The Respondent proposes that the following matters be included in the Record on Appeal:

1. The matters designated by the Plaintiffs with the exception of the Plaintiffs' Memoranda in Opposition of Defendant's Motion for Summary Judgment filed on August 20, 2018 and August 21, 2018, and the transcript of the August 22, 2018 hearing.
2. Order Joining Parties dated May 7, 2018 filed on May 8, 2018.
3. Affidavit of Service on Drummond B. Farley dated May 11, 2018 and filed on May 16, 2018.
4. Affidavit of Service on Rachel R. Farley dated May 10, 2018 and filed on May 16, 2018.
5. Acceptance of Service by Carol E. Farley dated August 13, 2018 and filed on August 13, 2018.

6. Acceptance of Service by Nancy E. Farley dated August 13, 2018 and filed on August 13, 2018.

7. Defendant's Motion for Summary Judgment dated July 20, 2018 and filed on July 20, 2018 without Exhibit A.

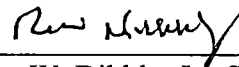
8. Affidavit of Ken Jumper dated July 20, 2018 and filed on July 20, 2018 with attachments.

9. Supplemental and Amended Motion for Summary Judgment dated August 16, 2018 and filed on August 16, 2018.

10. Affidavit of Ken Jumper dated August 17, 2018 and filed on August 17, 2018 with attachments.

11. Affidavit of Clay Sturkie dated August 15, 2018 and filed on August 15, 2018 with exhibits.

RESPECTFULLY SUBMITTED,



Robert W. Dibble, Jr., SC Bar #1675
Harrell, Martin & Peace, P.A.
135 Columbia Avenue
Post Office Box 1000
Chapin, South Carolina 29036
Telephone: (803) 345-3353
ATTORNEYS FOR RESPONDENT

March ^{17th}, 2020
Chapin, South Carolina

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v.

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PROOF OF SERVICE

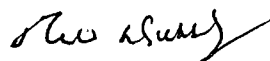
The undersigned hereby certifies that on March 17, 2020 he caused the *Initial Brief of Respondent, Counterdesignation of Matter to be Included in the Record on Appeal*, and *Motion to Exclude Matter from the Record on Appeal* to be sent via United States Postal Service, first class mail, with adequate postage prepaid, to the parties listed below:

William H. Edwards
Moore Taylor Law Firm
Post Office Box 5709
West Columbia, SC 29171

Drummond B. Farley
742 C. Avenue
West Columbia, SC 29169

Carol E. Farley
Post Office Box 1570
Johns Island, SC 29457

Nancy E. Farley
Post Office Box 1570
Johns Island, SC 29457



Robert W. Dibble, Jr., Esquire
Harrell, Martin & Peace, P.A.

Chapin, South Carolina
March 17, 2020

L.K. "Trey" Harrell, III
Jeremy C. Martin
M. Alan Peace **
Taylor A. Peace
Andrea "Andi" Cornelison
Erik T. Norton

Robert W. Dibble, Jr. *
William Jennings (Bill) Buchanan *
Donald W. Tyler *
Thomas B. Jackson, III *

*Of Counsel
**Certified Mediator/Arbitrator

March 17, 2020

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SC Court of Appeals

VIA HAND DELIVERY

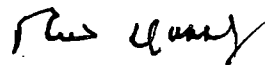
Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Rachel Farley, as Trustee of the Louise Farley Revocable Trust Dated February 8, 2005; Drummond B. Farley; Carol E. Farley; and Nancy E. Farley v: Church of the Harvest of Columbia, Inc.
Appellate Case No. 2019-001609
Our File No. 3303.28245

Dear Madam Clerk:

Attached for filing please find the original and one copy of the *Initial Brief of Respondent*, the original and one copy of the *Counterdesignation of Matter to be Included in the Record on Appeal*, the original and six copies of the *Motion to Exclude Matter from the Record on Appeal* and the original and one copy of the *Proof of Service* in the above-referenced matter. By copy of this letter and aforementioned pleadings, we are serving same upon all parties of record.

Yours very truly,



Robert W. Dibble, Jr.

RWDJR:rdh

Attachments

cc: William H. Edwards, Esquire
Mr. Drummond B. Farley
Ms. Carol E. Farley
Ms. Nancy E. Farley