

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
The Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

**RECEIVED**

Appellate Case No. 2018-002223

MAR 20 2020  
SC Court of Appeals

---

H. Hugh Andrews, Respondent,

v.

Quentin S. Broom, Jr., Appellant.

---

**RESPONDENT H. HUGH ANDREWS' DESIGNATION OF MATTER ON APPEAL**

---

1. All matters designated by Appellant.
2. Plaintiff's Complaint, filed September 15, 2005
3. Plaintiff's Motion for Partial Summary Judgment, filed September 15, 2010.
4. Exhibit 4 to Plaintiff's Motion Identified Above.
5. Print-out of Trial Court Docket.
6. Form 4 Orders of the Trial Court for September 26, 2018 and November 20, 2018.
7. Orders of the Trial Court entered October 14, 2016; June 2, 2017; June 29, 2017 (2).
8. Andrews' Petition for Attorney's Fees with Affidavits (filed December 15, 2017)
9. Trial Transcript (June 26-29, 2017), pp. 1-61; 116-170; 219-302; and 374-381.
10. Hearing Transcript, August 23, 2018.
11. Portions of the following Plaintiff's Exhibits: 1-13; 17; 19; 20-39.
12. Defendant's Exhibits 13 and 14.

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



---

Rodney F. Pillsbury (Fed Bar No.: 5963)  
301 Rutherford St.  
Greenville, SC 29609  
Phone: (864) 241-9828  
Fax: (864) 772-3418  
Email: [rodney@pillsburyfirm.law](mailto:rodney@pillsburyfirm.law)

March 16, 2020

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM SPARTANBURG COUNTY  
The Court of Common Pleas

J. Mark Hayes, II, Circuit Court Judge

**RECEIVED**

---

Appellate Case No. 2018-002223

MAR 20 2020  
SC Court of Appeals

---

H. Hugh Andrews, Respondent,

v.

Quentin S. Broom, Jr., Appellant.

---

**PROOF OF SERVICE**

---

I certify that I have served Initial Brief of Respondent and Designation of Matter on Appeal by depositing a copy of the same in the United States Mail, postage prepaid, on March 16, 2020 addressed to attorney of record, Matthew T. Richardson, Esq., Wyche, P.A., P O Box 12247, Columbia, SC 29211-2247



Rodney F. Pillsbury (Fed Bar No.: 5963)  
301 Rutherford St.  
Greenville, SC 29609  
Phone: (864) 241-9828  
Fax: (864) 772-3418  
Email: rodney@pillsburyfirm.law

March 16, 2020



301 Rutherford Street / Greenville, South Carolina 29609  
Phone: (864) 241-9828 / Fax: (864) 772-3418

March 16, 2020

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P O Box 11629  
Columbia, SC 29211

**RECEIVED**

**MAR 20 2020**

**SC Court of Appeals**

Re: H. Hugh Andrews v. Quentin S. Broom, Jr.  
Appellate Case No.: 2018-002223

Dear Ms. Kitchings:

We are enclosing for filing the Initial Brief of Respondent and Designation of Matter on Appeal along with a copy of our Certificate of Service for same.

By copy of this letter to opposing counsel, we are enclosing and serving upon him a copy of the same.

Please accept my best regards.

Very truly yours,

**Pillsbury Law Firm, LLC**

A handwritten signature in cursive script that reads 'R. Pillsbury'.

Rodney F. Pillsbury

RFP/tpd

enclosure(s)

cc: Matthew T. Richardson, Esq.  
Wyche, P.A.  
P O Box 12247  
Columbia, SC 29211-2247

Pillsbury Law Firm, LLC  
301 Rutherford Street  
Greenville, SC 29609

HANDPL  
\$3.930  
US POSTAGE  
FIRST-CLASS  
0628005491563  
20609  
EAGLE  
POSTNET

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P O Box 11629  
Columbia, SC 29211

**RECEIVED**  
MAR 20 2020  
SC Court of Appeals

