

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master in Equity

Appellate Case No. 2019-001216

Frances O. Johnson, Respondent,

v.

Mason C. Heyward, Berkeley Electric Cooperative, Inc., and Clementine Ravenel, Defendants,

Of Whom Mason C. Heyward is the Appellant.

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

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Respondent proposes the following to be included in the Record on Appeal:

- (1) Order of August 13, 2010
- (2) Order of June 30, 2015
- (3) Order of June 13, 2019
- (4) Transcript of January 14, 2013
- (5) Transcript of January 15, 2013
- (6) Transcript of January 17, 2013
- (7) Plaintiff's Exhibits 1, 1A, 2, 2A, 3A, 4, 5, 6, 7, 8, 10, 13
- (8) Defendant's Exhibit A, 9, 15
- (9) Complaint
- (10) Heyward's Answer
- (11) Heyward's Amended Answer and Crossclaim
- (12) Charleston County's Amended Answer
- (13) Berkeley Electric Cooperative, Inc.'s Answer

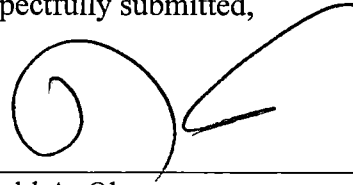
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- (14) Johnson's Answer to Heyward's Amended Answer and Crossclaim
- (15) Letter of Ralph L. Haynes, M.D. dated October 8, 2010 to the court
- (16) Ralph Haynes' Amended Answer and Crossclaims and Exhibit 2
- (17) Deposition of Ralph L. Haynes on November 25, 2012
- (18) Johnson Plat of April 15, 2010
- (19) Johnson Plat of October 20, 2015

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

April 22, 2020

Respectfully submitted,



Harold A. Oberman

S/M/O

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S/P/E/T

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Attorneys for the Respondent, Frances O.
Johnson and Respondent, Ralph L. Haynes

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PROOF OF SERVICE

I certify that I have served the Respondent's Designation of Matter To Be Included in the Record on Appeal by depositing one copy of it in the United States Mail, postage prepaid, on April 22, 2020, addressed to the Appellant's attorneys of record, John Edward Robinson, Esquire, 36 Broad Street, Charleston, SC 29401 and G. Simms McDowell, III, Esquire, 68 Legare Street, Charleston, SC 29401.

April 22, 2020



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Attorneys for Respondent, Frances O.
Johnson and Respondent, Ralph L. Haynes

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CERTIFICATE OF COUNSEL

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The undersigned hereby certifies that the Respondent's Designation of Matter complies with Rule 209(c) SCACR.

April 22, 2020



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April 22, 2020

Honorable V. Claire Allen
Deputy Clerk
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

RE: Francis O. Johnson, Respondent v. Mason C. Heyward, Berkeley Electric Cooperative, Inc., and Clementine Ravenel, Defendants; Of Whom Mason C. Heyward is the Appellant
Case No. 2008-CP-10-1054
Appellant Case No. 2019-001216

Dear Ms. Allen:

I enclose the original and one (1) copy of the Initial Brief of Respondent and Designation of Matter To Be Included in the Record on Appeal, along with the Proofs of Service and Certificate of Counsel, with regard to the above-captioned matter.

Upon filing, please return a clocked-in copy of each to our office in the enclosed self-addressed, stamped envelope.

Please note that we not only representing Francis O. Johnson but also Ralph L. Haynes. He is a Crossclaim Defendant and Counterclaimant in the underlying case and should be labeled as a Respondent in this Appellant case. I have enclosed a filed copy of the Form 4 and Consent Order signed by Judge Scarborough that allowed Ralph L. Haynes to enter his answer or other pleadings as well as a filed copy of the Findings of Fact and Order filed on June 30, 2015. We will await your advice on how to title this matter on our Final Brief.

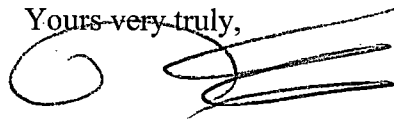
If you have any questions or need more information, please give us a call. With warmest personal regards, I remain

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SC Court of Appeals

Yours very truly,



Harold A. Oberman

HAO/shb
Enclosures

cc: John Edward Robinson, Esquire (w/enclosures)
G. Simms McDowell, III, Esquire (w/enclosures)

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