

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Trial Court Case No. 2017-CP-11-330
Appellate Case No. 2019-001414

RECEIVED
MAY 04 2020
SC Court of Appeals

Gladys B. Potter, _____, Respondent.

v.

Donald Moody and Shayan Investments Gaffney, LLC, Defendants,
Of Which Shayan Investments Gaffney, LLC is the, _____, Appellant

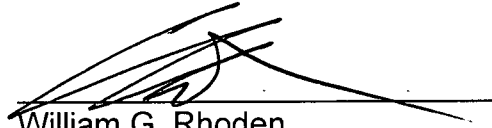
**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

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

1. Transcript of Hearing February 20, 2018;
2. Summons and Complaint filed by Plaintiff;
3. Certificate of Statutory Service (Letter from Secretary of State to Shayan Investments dated August 10, 2017);
4. Affidavit of Default dated October 13, 2017 with attachment;
5. Plaintiff's Motion dated December 29, 2017;
6. Plaintiff's Exhibit 1 (Medical Bills, 1 page);
7. Plaintiff's Exhibit 2 (5 photographs);
8. Plaintiff's Exhibit 3 (Property values and tax records, 45 pages);
9. Order and Judgment signed February 27, 2018;
10. Certificate of Service by Mail dated March 1, 2018.

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

May 1, 2020



William G. Rhoden
WINTER & RHODEN, LLC
221 E. Floyd Baker Blvd.
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FAX: (864) 489-8806
Attorney for Respondent

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Of Which Shayan Investments Gaffney, LLC is the, _____, Appellant

CERTIFICATE OF SERVICE BY MAIL

This is to certify that a copy of the **Respondent's Initial Brief** and **Respondent's Designation of Matter to be Included in the Record on Appeal** in the above referenced case was mailed to:

Scarlet B. Moore
P.O. Box 17615
Greenville, SC 29606

by depositing same in the United States Mail, postage prepaid, on the 1st day of May, 2020.



William G. Rhoden

Gaffney, South Carolina

LAW OFFICE OF
WINTER & RHODEN, LLC

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WILLIAM E. WINTER, JR.
(1944 - 2008)

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May 1, 2020

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SC Court of Appeals

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

RE: Gladys B. Potter v. Donald Moody and Shayan Investments Gaffney, LLC etal
Appellate Case No. 2019-001414

Dear Ms. Kitchens:

Enclosed please find the following:

1. Original and one (1) copy of Respondent's Initial Brief;
2. Original and one (1) copy of Respondent's Designation of Matter to be Included in the Record on Appeal; and
3. Original and one (1) copy of Certificate of Service on Opposing Counsel.

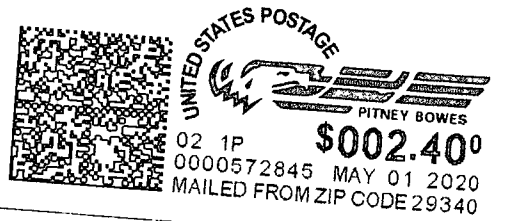
I would be greatly appreciative if you would return a filed copy of the Respondent's Initial Brief, Respondent's Designation of Matter to be Included in the Record on Appeal and Certificate of Service in the enclosed self addressed, stamped envelope provided.

With best regards, I am,

Sincerely,


William G. Rhoden

WGR/lmc
cc: file
Scarlet B. Moore (w/ enclosures)
enclosures



LAW OFFICE OF
WINTER & RHODEN, LLC

221 E. FLOYD BAKER BLVD.
GAFFNEY, SOUTH CAROLINA 29340

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