

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

Case No. 2020-000061

**RECEIVED**

**May 13 2020**

**SC Court of Appeals**

Essie Ruth Ford,

Appellant

v.

Ralph Kline,

Respondent

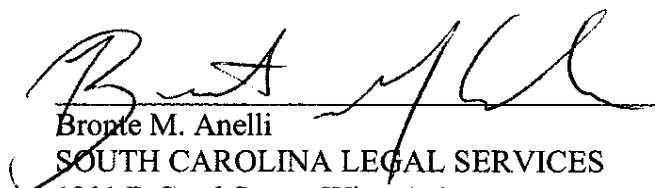
DESIGNATION OF THE MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL

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

1. Final Order Granting Defendant’s Motion for Judgement on the Pleadings filed December 18, 2019;
2. Complaint filed February 26, 2019;
3. Answer and Counterclaim filed September 03, 2019;
4. Reply to Defendant’s Answer filed September 18, 2019;
5. Notice and Motion for Judgement on the Pleadings filed October 24, 2019
6. Memorandum in Support of Defendant’s Motion for Judgement on the Pleadings filed October 24, 2019
7. Plaintiff’s Response in Opposition of Defendant’s Motion to Dismiss filed November 18, 2019
8. Transcript of arguments at hearing transcribed by Grace L. Hurley;
9. Plaintiff’s Exhibit B filed February 26, 2019

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

May 13, 2020



Bronte M. Anelli  
SOUTH CAROLINA LEGAL SERVICES  
1201 B Creel Street, Wing A-1  
Conway, SC  
(843) 381-8182  
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Attorneys for Appellant Essie Ford

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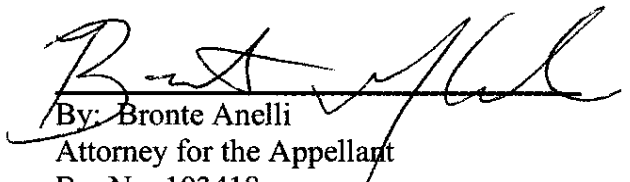
CERTIFICATE OF SERVICE

I certify that I have served the Appellant's Initial Brief and Designation of Matter by mailing a copy of it to the office for Respondents' counsel of record on May 13, 2020 as follows:

J. Austin Thomas, Esq  
440 Oleander Dr. Suite 104  
Myrtle Beach, SC 29577

May 13, 2020

SOUTH CAROLINA LEGAL SERVICES



By: Bronte Anelli  
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May 13, 2020

**SENT VIA FAX AT 803-734-1839; AND EMAIL**

South Carolina Court of Appeals  
 Clerk of Courts  
 PO Box 11629  
 Columbia, SC 29211

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**May 13 2020**

**SC Court of Appeals**

Re: Essie Ford v. Ralph Kline  
 Appellate Case No: 2020-000061

Dear Clerks,

Please find enclosed a copy of the Appellant's Initial Brief, the Designation of Matter, and a Certificate of Service. According to the Chief Justice's Order on Operations, we are only required to fax the initial brief. If you require a mailed copy, please inform me immediately so I may comply.

If you have any questions or concerns, please give me a call at 843.381.8182.

Sincerely,

**South Carolina Legal Services**  
 Bronte M. Anelli  
 Attorney for the Appellant





South Carolina  
Legal Services

*Balancing the Scales of Justice*

FACSIMILE TRANSMITTAL SHEET

TO: Court of Appeals FROM: Bronte M. Anelli, ESQ.  
Clerk of Courts

COMPANY: SC Legal Services DATE: May 13, 2020

FAX NUMBER: 803-734-1839 TOTAL NO. OF PAGES INCLUDING COVER: 18

RE: Ford v. Kline 2020-00061

- URGENT     FOR REVIEW     PLEASE COMMENT     PLEASE REPLY     PLEASE RECYCLE

NOTES/COMMENTS:

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**May 13 2020**

**SC Court of Appeals**

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