

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

**May 22 2020**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

**SC Court of Appeals**

Appellate Case No.: 2019-001811

Best Choice Roofing & Home Improvement, Inc. ....Appellant,

v.

Tyler Woods.....Respondent.

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**RESPONDENT'S  
DESIGNATION OF MATTER**

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Pursuant to Rule 209, SCACR, Respondent Tyler Woods, designates the following items for inclusion in the record on appeal. Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter that is irrelevant to the appeal:

1. Cease and desist letter sent from Appellant to Respondent's former employer, dated November 6, 2017;
2. Appellant's Summons and Complaint, March 8, 2018;
3. Respondent's Answer and Counterclaims, June 11, 2018;
4. Respondent's Motion to Dismiss, June 11, 2018;
5. Respondent's Motion to Compel, September 7, 2018;
6. Form 4 Order, October 3, 2018;
7. Respondent's Notice of Motion and Motion to Deem Admitted Requests for Admission Not Responded to By Plaintiff, November 16, 2018;
8. Appellant's Motion to Amend, December 18, 2018;
9. Respondent's Motion for Summary Judgment, December 19, 2018;

10. Respondent's Memorandum in Support of Motion for Summary Judgment, January 24, 2019;
11. Respondent's Memorandum in Opposition to Plaintiff's Motion to Amend the Complaint, January 30, 2019;
12. Order granting Respondent's Motion for Summary Judgment and denying Appellant's Motion to Amend Complaint, February 19, 2019;
13. Appellant's Motion to Alter or Amend, February 28, 2019;
14. Order granting Respondent's Motion for Summary Judgment and denying Appellant's Motion to Amend Complaint, March 20, 2019;
15. Appellant's Motion to Alter or Amend, March 28, 2019;
16. Transcript of Record, January 30, 2019;
17. Order denying Appellant's Motion to Alter or Amend, October 22, 2019;
18. Notice of Appeal, dated October 22, 2019.

\_\_\_\_s/ Sarah J.M. Cox  
Nekki Shutt (SC Bar No. 8784)  
Sarah J.M. Cox (SC Bar No. 104316)  
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**ATTORNEYS FOR RESPONDENT TYLER  
WOODS**

May 22, 2020

Columbia, South Carolina

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**CERTIFICATE OF SERVICE**

I do hereby certify that I have served a copy of the following as indicated herein below, by emailing a copy of same on the date below addressed to the following:

**DOCUMENT SERVED:      RESPONDENT’S DESIGNATION OF MATTER ON APPEAL**

**PARTIES SERVED:**

Townes B. Johnson, III, Esq.  
TOWNES B. JOHNSON III LLC  
P.O. Box 9246  
Greenville, SC 29604  
[tjohnson@sc.legal](mailto:tjohnson@sc.legal)  
**Attorney for Appellant**

\_\_\_\_\_/s/ Sarah J.M. Cox\_\_\_\_\_  
Attorney  
Burnette Shutt & McDaniel, P.A.

Columbia, South Carolina

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Tyler Woods.....Respondent.

**PROOF OF SERVICE**

The undersigned hereby certifies that a true copy of Respondent's Designation of Matter on Appeal in the above-referenced matter has been served on all parties of record by emailing a copy of the same to the following:

Townes B. Johnson, III, Esq.  
TOWNES B. JOHNSON III LLC  
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[tjohnson@sc.legal](mailto:tjohnson@sc.legal)

s/Sarah J.M. Cox  
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**ATTORNEYS FOR RESPONDENT TYLER  
WOODS**

May 22, 2020  
Columbia, South Carolina

## Amy L. Abercrombie

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**From:** Sarah J. M. Cox  
**Sent:** Friday, May 22, 2020 12:09 PM  
**To:** Townes Johnson  
**Cc:** Nekki Shutt, Esq.; Amy L. Abercrombie  
**Subject:** Best Choice Roofing v. Tyler Woods  
**Attachments:** Respondent's Designation of Matter.pdf

Townes,

I hope you are well. Please see attached and served on you Respondent's Designation of Matter on Appeal in the above case, filed this morning.

Sarah Cox



**BURNETTE  
SHUTT MCDANIEL**  
Moving law forward.

**RECEIVED**

**May 22 2020**

**SC Court of Appeals**

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**Sarah J. M. Cox** Attorney  
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**BURNETTESHUTT.LAW**



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