

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

Trial Court Case No. 2019-CP-26-01113
Appellate Case No. 2020-000061

Essie Ford,

Respondent,

v.

Ralph Kline,

Appellant.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

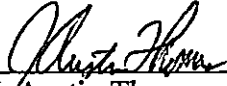
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Respondent proposes the following be included in the Record on Appeal:

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

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

June 9, 2020



J. Austin Thomas
4420 Oleander Drive, Suite 104
Myrtle Beach, South Carolina 29577
(843) 444-5702
Attorney for Respondent

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I certify that I have served Initial Brief of Respondent and Respondent's Designation of Matter on all counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on June 9, 2020, addressed as follows:

Bronte Anelli, Esquire
South Carolina Legal Services
1201 B Creel Street, Wing A-1
Conway, South Carolina 29527

June 9, 2020



J. Austin Thomas
GROOMS & THOMAS, LLC
4420 Oleander Drive, Suite 104
Myrtle Beach, South Carolina 29577
(843) 444-5702

Attorney for Respondent



J. Stephen Grooms
Attorney at Law
sgrooms@groomsandthomaslaw.com

June 9, 2020

J. Austin Thomas
Attorney at Law
athomas@groomsandthomaslaw.com

Via UPS

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

**RE: In re Motions to Intervene in Essie Ford vs. Ralph Kline
Appellate Case No.: 2020-00061**

Dear Ms. Kitchings:

Please find enclosed the original and one (1) copy each of the Initial Brief of Respondent Essie Ford and Respondent Essie Ford's Designation of matter to be Included in the Record of Appeal. If you would like, please file the originals with the Court and return a file-stamped copy thereof to my office in the enclosed self-addresses stamped envelope provided for your convenience.

Should you have any questions or require any additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Austin Thomas', written in a cursive style.

J. Austin Thomas

JAT/snj
Enclosures

Cc: Bronte Anelli, Esq. (w/enclosure)- *(via U.S. Mail only)*

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JUSTIN THOMAS
4470 OLEANDER DR
BTE 104
Myrtle Beach SC 29577

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