

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

RECEIVED  
JUL 07 2020  
SC Court of Appeals

APPEAL FROM LAURENS COUNTY

Donald B. Hocker, Circuit Court Judge

Appellate Case No.: 2019-001514

Martha Foster Watts ..... Appellant,

v.

Ricky W. Chastain, Sheriff Laurens County, South Carolina ..... Respondent.

**Appellant’s Revised Designation of Matter to be Included in the Record on Appeal**

Appellant designates the following matter to be included in the record on appeal:

**ORDERS AND JUDGMENT**

- 1. April 20, 2018 Judgment form (unserved) with Verdict (4 pages)
- 2. August 6, 2019 Order Denying mot. for new trial (6 pages)
- 3. February 7, 2020 Order of Ct. App. granting P's MEXT (1 page)

**PLEADINGS**

- 4. August 13, 2015 Summons and Complaint (4 pages)
- 5. September 14, 2015 Answer to Complaint (4 pages)
- 6. December 17, 2015 Amended Complaint (3 pages)
- 7. January 14, 2016 Answer to Amended Complaint (5 pages)

**TRANSCRIPTS**

- 8. August 16-19, 2018 Trial Transcript (451 pages)
- 9. December 19, 2018 Post-trial Hearing Transcript (24 pages)

## **EXHIBITS**

10. April 17, 2018	P's [trial] Ex. 1, Sheriff's Incident Report	(1 page)
11. April 17, 2018	P's [trial] Ex. 3 (Holmes interview by Duncan)	(17 pages)
12. April 19, 2018	D's [trial] Ex. 6 – video (placeholder page noting exhibit is to be submitted by the Clerk of Court for Laurens County)	(1 page)

## **MOTIONS, RESPONSES & MEMORANDA**

13. April 18, 2018	P's memo supporting [oral] mot. to suppress video (with attachments)	(18 pages)
14. April 18, 2018	P's memo supporting [oral] mot. in limine	(14 pages)
15. April 27, 2018	P's motion for new trial	(3 pages)
16. June 21, 2018	D's response opposing new trial	(9 pages)
17. February 6, 2019	D's memo opposing new trial	(15 pages)
18. December 19, 2018	P's memo supporting a new trial	(19 pages)
19. April 2, 2019	P's supplemental memo supporting new trial	(5 pages)

## **OTHER MATERIALS**

### **Pre-trial Correspondence**

20. April 4, 2018	Harter letter to Thompson, with attached markup re: Holmes video dep.	(7 pages)
21. April 9, 2018	Email Thompson to Harter	(1 page)
22. April 10, 2018	Harter letter to Thompson	(1 page)
23. April 11, 2018	Email Thompson to Harter with attached markup re: Holmes video dep.	(8 pages)

### **De Bene Esse Evidence**

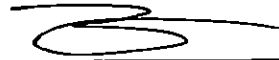
24. March 16, 2018	Unredacted Holmes de bene esse dep.	(81 pages)
25. April 17, 2018	Holmes video dep placeholder page noting video submitted by Laurens County Clerk of Court	(1 page)

### **In the Court of Appeals**

26. September 5, 2019	Notice of Appeal (without attachments)	(1 page)
27. September 24, 2019	Transcript request	(2 pages)
28. September 26, 2019	Agreement of counsel as to Transcript	
29. December 31, 2019	Amended Notice of Appeal	
30. January 2, 2020	Additional transcript request	(1 page)
31. February 2, 2020	MEXT re Appellant's Initial Brief	(2 pages)

Undersigned counsel for Appellant certifies that this Revised Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted this 14 day of July 2020.



---

Thomas J. Thompson  
Townsend & Thompson  
Registered Limited Liability Partnership  
210 West Laurens Street  
P.O. Box 215  
Laurens SC 29360  
(864) 984-6554  
Attorneys for Appellant

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

The Honorable Donald B. Hocker, Circuit Court Judge

Appellate Case Number: 2019-001514

**RECEIVED**

JUL 07 2020

SC Court of Appeals

Martha Foster Watts, ..... Appellant,

v.

Ricky W. Chastain, Sheriff  
Laurens County, South Carolina, ..... Respondent.

**PROOF OF SERVICE**

I certify that I have served the Appellant's Initial Reply Brief and , Revised Designation of Matter to be included in the Record on Appeal, by depositing a copy of it in the United States Mail, postage prepaid, on July 6, 2020, addressed to the attorneys of record, Russell W. Harter, Jr., Chapman, Harter & Harter, Post Office Box 10224, Greenville, South Carolina 29603 and A. Cruickshanks, IV., Post Office Box 786, Clinton, South Carolina 29325.

Dated: July 6, 2020



Thomas J. Thompson  
TOWNSEND & THOMPSON  
Registered Limited Liability Partnership  
Post Office Box 215  
Laurens, South Carolina 29360  
(864) 984-6554  
Attorney for Appellant

**TOWNSEND & THOMPSON**  
REGISTERED LIMITED LIABILITY PARTNERSHIP  
ATTORNEYS AT LAW  
TOWNSEND BUILDING  
P. O. BOX 215  
210 WEST LAURENS STREET  
LAURENS, SOUTH CAROLINA 29360

RICHARD T. TOWNSEND  
THOMAS J. THOMPSON

TELEPHONE (864) 984-6554  
FAX (864) 984-8000  
EMAIL tandt@backroads.net

July 6, 2020

**RECEIVED**  
JUL 07 2020  
SC Court of Appeals

via FEDEX OVERNIGHT

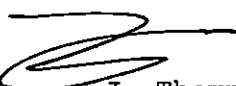
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29211

RE: **Martha Foster Watts v. Ricky W. Chastain, Sheriff Laurens County, South Carolina**  
**(2019-001514)**

Dear Ms. Kitchings:

You will find enclosed the Appellant's Initial Reply Brief, Revised Designation of Matter to be included in the Record on Appeal, and Proof of Service on Respondent's Attorneys of record.

Sincerely,

  
Thomas J. Thompson  
Post Office Box 215  
Laurens, South Carolina 29360  
(864) 984-6554  
Attorney for the Appellant

TJT/shs

Enclosures

cc: Russell W. Harter, Jr. (via FEDEX OVERNIGHT)  
Chapman, Harter & Harter  
14 Lavinia Ave.  
Greenville, South Carolina 29603

A. Cruickshanks, IV (via FEDEX OVERNIGHT)  
200 N. Broad St.  
Clinton, South Carolina 29325

ORIGIN ID:GSPA (864) 984-6554  
THOMAS THOMPSON  
TOWNSEND & THOMPSON, LLP  
PO BOX 215

SHIP DATE: 06JUL20  
ACTWGT:  
CAD: 251785518/NET4220

LAURENS, SC 29360  
UNITED STATES US

BILL SENDER

TO HONORABLE JENNY ABBOTT KITCHINGS

1220 SENATE STREET

COLUMBIA SC 29201

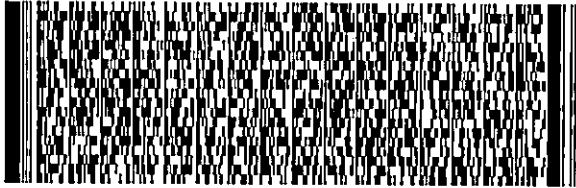
(803) 734-1890

REF: WATTS VS. CHASTAIN

INV:  
PO:

DEPT:

56B.021787FE4A



FedEx  
Express



JUN132016 04:10:00

TUE - 07 JUL 10:30A  
PRIORITY OVERNIGHT

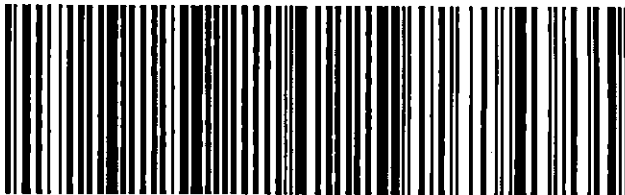
TRK# 7708 7638 8178  
0201

ASR

XH USCA

29201

SC-US CAE



RECEIVED

JUL 07 2020

SC Court of Appeals