

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge

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Appellate Case No. 2020-000638

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**RECEIVED**  
JUL 29 2020  
SC Court of Appeals

Gerald Nelson,

Appellant,

v.

Christopher S. Harris and Charles L.  
Baughman, Sr. d/b/a K&B Towing,  
LLC,

Respondents.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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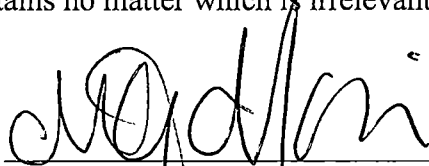
Appellant, Mr. Gerald Nelson, proposes the following be included in the Record on Appeal:

1. Summons and Complaint, dated June 19, 2018;
2. Defendants' Answer, dated July 20, 2018;
3. Defendants' Offer of Judgment Dated January 4, 2019;
4. Dr. Hunt's Deposition Transcript dated August 19, 2019;
5. Trial Transcript, dated January 21, 2020, January 23, 2020, and January 24, 2020;
6. Court's Exhibit Number 6 – Appellant's Proposed Jury Charge "Forbidding the consideration of insurance coverage (or Judge Anderson's 13-20)";

7. Court's Exhibit Number 7 – Note from and to the Jury;
8. Verdict Form, dated January 24, 2020;
9. Form 4 Order, dated January 30, 2020;
10. Appellant's Notice of Motion and Motion for New Trial *Nisi Additur* or New Trial Absolute, dated January 27, 2020;
11. Respondents' Response in Opposition to Appellant's Motion for New Trial *Nisi Additur* or New Trial Absolute, dated January 30, 2020;
12. Gerald Nelson's Proposed Order Granting Motion for New Trial, electronically filed on April 10, 2020;
13. Order Denying Appellant's Motion for New Trial *Nisi Additur* or New Trial Absolute, dated April 28, 2020;
14. Respondent's Motion for Costs and Reduction of Jury Verdict Pursuant(sic) to Offer of Judgement;
15. Order Granting Respondent's Motion for Costs and Reduction of Verdict due to offer of Judgment dated April 1, 2020.

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

Dated: July 27, 2020



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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge

Case No. 2018-CP-32-02102

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Gerald Nelson,

Appellant,

v.

Christopher S. Harris and Charles L. Baughman, Sr.  
d/b/a K&B Towing, LLC,

Respondents.

PROOF OF SERVICE

I certify that I have served the Appellant's Initial Brief and Appellant's Designation of Matter to be Included in the Record on Appeal on Respondents, Christopher S. Harris and Charles L. Baughman, Sr., d/b/a K&B Towing, LLC by depositing a copy of it in the United States Mail, postage prepaid, on July 27, 2020 addressed to Respondents' attorneys of record:

John M. Grantland, Rogers E. Harrell, III, Wesley B. Sawyer and Sarah Caiello  
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*Attorneys for Appellant*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY,  
Court of Common Pleas

Donald B. Hocker, Circuit Court Judge

Case No. 2018-CP-32-02102

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SC Court of Appeals

Gerald Nelson,

Appellant,

v.

Christopher S. Harris and Charles L. Baughman, Sr.  
d/b/a K&B Towing, LLC,

Respondents.

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July 27, 2020

**RECEIVED**  
JUL 29 2020  
SC Court of Appeals

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

RE: Gerald Nelson v. Christopher S. Harris and Charles L. Baughman, Sr.,  
d/b/a K&B Towing, LLC  
Appellate Case No: 2020-000638

Dear Ms. Kitchings:

Enclosed for filing is Appellant's Initial Brief, Designation of Matter and Proof of Service. Please return a clocked copy to my office via email to my paralegal, [jo.boyd@mcwhirterlaw.com](mailto:jo.boyd@mcwhirterlaw.com).

Sincerely,

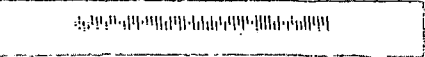
*Melissa G. Mosier*  
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cc: Rogers E. Harrell, III, Esq.  
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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
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