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**THE STATE OF SOUTH CAROLINA**

**In the Court of Appeals**

**SC Court of Appeals**

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APPEAL FROM LAURENS COUNTY

Donald B. Hocker, Circuit Court Judge

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Appellate Case No.: 2019-001514

Martha Foster Watts ..... Appellant,

v.

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

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**Appellant's Second Amended 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 19, 2018	Judgment form (unserved) with Verdict	(4 pages)
2. August 5, 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 15, 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)

11/8

## **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, placeholder page noting video	(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	(20 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. December 30, 2018	P's memo supporting a new trial	(19 pages)
18. February 6, 2019	D's memo opposing new trial	(15 pages)
19. February 12, 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	(8 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.	(3 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	(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	(1 page)
29. December 31, 2019	Amended Notice of Appeal	(1 page)
30. December 31, 2019	Additional transcript request	(1 page)
31. February 4, 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 5<sup>th</sup> day of ~~July~~ <sup>August</sup> 2020.



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**SC Court of Appeals**

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August 3, 2020

Jenny Abbott Kitchings  
Clerk of Court  
The South Carolina Court of Appeals  
Post Office Box 11620  
Columbia, South Carolina 29211

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

Dear Ms. Kitchings:

Enclosed is the Appellant's Motion to Amend Designation of Matter to be included in the Record on Appeal (2<sup>nd</sup>), along with the filing fee, \$50.00. I have also enclosed the Proof of Service upon Respondent's counsel.

I additionally have enclosed Appellant's Second Amended Designation of Matter to be Included in the Record on Appeal.

Sincerely,



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Attorney for the Appellant

TJT/cav

Enclosures

cc: Russell W. Harter, Jr.  
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