

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
J. Cordell Maddox, Jr., Circuit Court Judge

---

**RECEIVED**

**Aug 28 2020**

**SC Court of Appeals**

---

Appellate Case No. 2019-002099

---

Machelle Smith, ..... Appellant.

v.

Columbia Sussex Corporation  
d/b/a Hilton Head Marriott Resorts and Spa;  
Columbia Sussex Management, LLC; and  
Columbia Properties Hilton Head, LLC, ..... Respondents.

---

**DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL  
BY RESPONDENTS**

---

In accordance with Rule 209 of the Appellate Court Rules, Respondents designate the following portions of the transcript, pleadings, orders, exhibits, or other materials, to be included in the Record on Appeal:

**Orders/Decisions**

1. Order Granting Defendants Motion for Summary Judgment, filed February 5, 2019;
2. Order Denying Plaintiff's Motion to Alter, Amend, and/or Reconsider, filed November 18, 2019.

**Pleadings**

3. Summons and Complaint, filed March 31, 2016;

4. Answer to Complaint, filed May 3, 2016;
5. Defendants' Motion for Summary Judgment, filed August 27, 2018;
6. Defendants' Memorandum in Support of Motion for Summary Judgment;
7. Motion to Alter or Amend, filed February 15, 2019;

**Transcript**

8. Excerpts from transcript of Plaintiff's deposition, March 15, 2017.

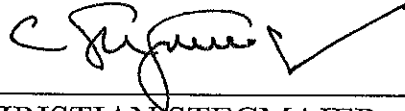
**Exhibits**

9. Complete Police Report;
10. Hotel Incident Report;
11. Guest Statement Report;
12. Photographs;
13. Payroll Employee Master Inquiry;
14. Briana Cohen Application;
15. October 5, 2018, Email with Court;
16. December 10, 2018, Email Correspondence from Judge Maddox.

Respondents certify that this Designation contains no matter, which is irrelevant to the appeal.

[SIGNATURE PAGE TO FOLLOW]

Respectfully Submitted,  
COLLINS & LACY, PC



---

CHRISTIAN STEGMAIER

SC Bar No. 68648

[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)

KELSEY J. BRUDVIG

SC Bar No. 101680

[kbrudvig@collinsandlacy.com](mailto:kbrudvig@collinsandlacy.com)

1330 Lady Street, Sixth Floor (29201)

Post Office Box 12487

Columbia, South Carolina 29211

(803) 256-2660 (main)

(803) 771-4484 (facsimile)

ATTORNEYS FOR RESPONDENTS

**DESIGNATION OF MATTER**

Columbia, South Carolina  
August 28, 2020

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

**RECEIVED**

**Aug 28 2020**

APPEAL FROM BEAUFORT COUNTY  
J. Cordell Maddox, Jr., Circuit Court Judge

---

**SC Court of Appeals**

Appellate Case No. 2019-002099

---

Machelle Smith, ..... Appellant.

v.

Columbia Sussex Corporation  
d/b/a Hilton Head Marriott Resorts and Spa;  
Columbia Sussex Management, LLC; and  
Columbia Properties Hilton Head, LLC, ..... Respondents.

---

**PROOF OF SERVICE**

---

I hereby certify that I served this **Initial Brief of Respondents and Designation of Matter** upon all parties, by placing a copy in the United States mail, postage prepaid, on August 28, 2020, addressed to the following:

John E. Parker, Jr.  
Peters, Murdaugh, Parker,  
Eltzroth & Detrick, P.A.  
Post Office Box 457  
Ridgeland, SC 29924



---

CHRISTIAN STEGMAIER

SC Bar No. 68648

[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)

KELSEY J. BRUDVIG

SC Bar No. 101680

[kbrudvig@collinsandlacy.com](mailto:kbrudvig@collinsandlacy.com)

Post Office Box 12487

Columbia, South Carolina 29211

(803) 256-2660 (main)

(803) 771-4484 (facsimile)

ATTORNEYS FOR RESPONDENTS

**PROOF OF SERVICE**



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

August 28, 2020

**VIA U.S. MAIL AND EMAIL**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**RECEIVED**

**Aug 28 2020**

**SC Court of Appeals**

**Re: *Machelle Smith v. Columbia Sussex Corporation d/b/a Hilton Head Marriott Resorts & Spa; Columbia Sussex Management, LLC; and Columbia Properties Hilton Head, LLC***  
**Appellate Case No. 2019-002099**  
**Claim No. 007164-006563-GD-01**  
**C&L File No. 001831-00104**

Dear Ms. Kitchings:

Please find enclosed for filing the unbound original and one (1) copy of the Initial Brief of Respondents, Designation of Matter, and Proof of Service in the above referenced matter. Please file the original and return a clocked copy of same to our office in the envelope provided for your convenience.

Pursuant to the Supreme Court's Amended Order "re: Operation of the Appellate Courts During the Coronavirus Emergency" (2020-05-29-02, Appellate Case No. 2020-000447), we have not included any additional copies. If any additional copies are required, please let us know.

By copy of this letter to Appellant's counsel, we are serving same on them.

Thank you for your attention to this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "C. Stegmaier".

Christian Stegmaier

CS/net

Encl.

cc (via U.S. Mail and email):

John E. Parker, Esquire, Peters Murdaugh Parker Eltzroth & Detrick