

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Appeal No.: 2020-000581

**RECEIVED**  
**Sep 23 2020**  
**SC Court of Appeals**

Harland Jones, ..... Appellant,

v.

Karen Robinson, ..... Respondent.

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

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

1. Form 4 Order, filed March 23, 2020;
2. Amended Order Granting Defendant’s Motion for Sanctions, filed March 2, 2020;
3. Order Granting Defendant’s Motion for Sanctions, filed Oct. 31, 2019;
4. Order Denying Plaintiff’s Rule 59 Motion to Alter or Amend, filed July 24, 2019;
5. Order Granting Defendant’s Motion to Compel, filed July 3, 2019;
6. Order Granting Rule to Show Cause, filed Oct. 30, 2018;
7. Form 4 Order, filed Oct. 3, 2018;
8. Summons and Complaint filed March 16, 2018;
9. Defendant’s Interrogatories to Plaintiff, dated May 1, 2018;
10. Answer, filed May 8, 2018;
11. Amended Answer and Counterclaim, filed May 22, 2018;

12. Plaintiff's Notice of Motion, Motion to Dismiss, and Memorandum of Law in Support Thereof, filed June 5, 2018;
13. Plaintiff's Answer to Defendant's Counterclaim, filed June 5, 2018;
14. Notice of Motion and Motion to Compel Discovery, filed Aug. 10, 2018;
15. First Supplemental Interrogatories to Plaintiff, dated August 14, 2018;
16. Letter from Lane D. Jeffries to J. Andrew Delany dated Sept. 5, 2018;
17. Letter from Lane D. Jeffries to J. Andrew Delany and Rogers Edward Harrell dated Sept. 26, 2018;
18. Motion for Rule to Show Cause, filed Oct. 23, 2018, w/Attachment;
19. Plaintiff's Answer to Defendant's Second Set of Interrogatories, dated Nov. 7, 2018;
20. Defendant's Motion for Summary Judgment, filed March 6, 2019;
21. Notice of Motion and Motion to Compel Discovery, filed March 7, 2019;
22. Plaintiff's Response to Defendant's Second Set of Requests for Admission, served April 4, 2019;
23. Plaintiff's Response in Opposition to Defendant's Motion for Summary Judgment, filed May 7, 2019;
24. Defendant's Memorandum in Support of Motion for Summary Judgment, filed May 7, 2019;
25. Email from B Bayne to teamjefferies@googlegroups.com, dated May 10, 2019;
26. Email from Lane Jefferies to Brett Bayne, dated May 13, 2019;
27. Email from Brett Bayne to Judge Couch, dated May 14, 2019, w/Attachment;
28. Email from Brett Bayne to Judge Couch, dated May 28, 2019;
29. Email from Brett Bayne to Judge Couch, dated June 21, 2019;
30. Email from Judge Couch to Brett Bayne, dated June 21, 2019;
31. Email from Brett Bayne to Lane Jefferies dated June 21, 2019;
32. Email from Judge Couch to Brett Bayne dated June 24, 2019;

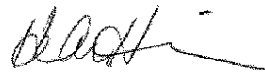
33. Mediation Results Report, filed June 27, 2019;
34. Defendant's Motion for Sanctions, filed June 27, 2019;
35. Defendant's Memorandum in Support of Motion for Sanctions, dated June 27, 2019, w/Exhibits, filed June 27, 2019;
36. Plaintiff's Motion to Alter or Amend Pursuant to Rule 59, filed July 3, 2019;
37. Defendant's Motions in Limine, filed July 5, 2019;
38. Plaintiff's Supplemental Responses to Defendant's First Set of Interrogatories, dated July 5, 2019, with transmittal email from Donna Mills at Anastopoulo Law Firm;
39. Email from Brett Bayne to Donna Mills and TeamJefferies, dated July 5, 2019;
40. Defendant's Motion for Summary Judgment, filed July 10, 2019;
41. Defendant's Memorandum in Opposition to Plaintiff's Motion to Alter or Amend, filed July 16, 2019;
42. Plaintiff's Notice of Motion and Motion for Sanctions for ADR Abuse Including Breach of Confidentiality, filed July 29, 2019;
43. Plaintiff's Motion for Sanctions and Preliminary Memorandum in Opposition to Defendant's (Second) Motion for Summary Judgment, filed July 29, 2019;
44. Affidavit of Brett H. Bayne, filed Oct. 25 2019;
45. Affidavit of Brett H. Bayne, filed Oct. 31, 2019;
46. Plaintiff's Notice of Motion and Motion for Sanctions Regarding Fraudulent Misrepresentations to the Court, filed Nov. 8, 2019, with Exhibit J;
47. Plaintiff's Motion to Alter, Amend, and/or Reconsider, filed Nov. 8, 2019;
48. Defendant's Replies to Plaintiff's Motion to Alter, Amend, and/or Reconsider and Plaintiff's Second Motion for Sanctions, filed Nov. 21, 2019;
49. Affidavit of Brett H. Bayne, filed March 23, 2020;
50. Notice of Appeal, filed April 1, 2020;
51. Transcript of October 1, 2018 Hearing before Judge DeAndrea G. Benjamin, pp. 3-10, 20, 21;

52. Transcript of March 6, 2019 Deposition of Harlan Jones, pp. 28-30, 32, 33, 36, 40, 44-47, 51, 52, 80-82, 92, 93, 97-104, 107, 112, 113, 117;
53. Transcript of May 7, 2019 Hearing before Judge Roger Couch, pp. 10-17, 19-23;
54. Transcript of July 8, 2019 Hearing before Judge Alison Lee, pp. 6, 25, 26, 29, 32-39;
55. Transcript of Trial before Judge L. Casey Manning, held August 13 & 14, 2019, pp. 16-18, 77-82, 96, 97, 107-110, 127, 135-137, 159-161, 163, 164, 168, 169, 306;
56. Transcript of September 27, 2019 Hearing before Judge Robert E. Hood, pp. 6, 8, 9, 11-16, 18, 19, 23, 28-33, 35, 39-47, 53-56, 58, 59, ;
57. September 27, 2019 Hearing Exhibit Nos. 2 and 3; and,
58. Transcript of December 5, 2019 Hearing before Judge Robert E. Hood, pp. 2, 7, 8, 35-38, 43-45, 71-75, 77, 80.

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

September 23, 2020

**McANGUS GOUDELOCK & COURIE LLC**



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Helen F. Hiser  
S.C. Bar No.: 76124  
55 East Camperdown Way, Suite 300 (29601)  
Post Office Box 2980  
Greenville, South Carolina 20602-2980  
(843) 576-2930  
helen.hiser@mgclaw.com

*Attorneys for Defendant Karen Robinson*

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APPEAL FROM RICHLAND COUNTY  
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Harland Jones, ..... Appellant,

v.

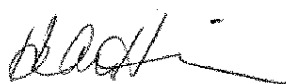
Karen Robinson, ..... Respondent.

**PROOF OF SERVICE**

I certify that I have served the **Initial Brief of Respondent** and Respondent's **Designation of Matter to be Included in the Record on Appeal** on Harland Jones, by emailing depositing a copy of it in the United States Mail, postage prepaid, on September 23, 2020, addressed to his attorneys of record, as follows:

Lane Jefferies, Esq.  
Eric M. Poulin, Esq.  
Roy T. Willey, Esq.  
Gus A. Anastopoulos, Esq.  
ANASTOPOULO LAW FIRM, LLC  
32 Ann Street  
Charleston, South Carolina 29403

Wallace K. Lightsey, Esq.  
John C. Moylan, III, Esq.  
Meliah Bowers Jefferson, Esq.  
WYCHE, P.A.  
POST OFFICE BOX 728  
Greenville, South Carolina 29602-0728



Helen F. Hiser  
McANGUS GOUDELOCK & COURIE LLC  
Post Office Box 2980  
Greenville, South Carolina 29602-2980  
(843) 576-2930

*Attorneys for Respondent Karen Robinson*



**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

September 23, 2020

**RECEIVED****Sep 23 2020****SC Court of Appeals****Via Facsimile**

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

RE: Harland Jones vs. Karen Robinson  
Civil Action No.: 2018-CP-40-01518 (Richland)  
Date of Incident: June 7, 2017  
Carrier Claim No.: 0459413365  
MGC File No.: 20554.18101  
Appeal No.: 2020-000581

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

1. the original and one copy of the Initial Brief of Respondent Karen Robinson;
2. the original and one copy of Respondent's Designation of Matter to be Included in the Record on Appeal; and
3. the original and one copy of Respondent's Proof of Service concerning items one and two.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Helen F. Hiser

cc: Lane D. Jefferies, Esquire  
Eric M. Poulin, Esquire  
Roy T. Willey, IV, Esquire  
Gus A. Anastopoulo, Esquire  
Wallace K. Lightsey, Esquire  
John C. Moylan, III, Esquire  
Meliah Bowers Jefferson, Esquire