

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jocelyn Newman, Circuit Court Judge

RECEIVED
Sep 14 2020
SC Court of Appeals

Appellate Case No. 2020-000589

Bridgett Taylor,..... Respondent,

v.

Richland County Sheriff's Department,.....Appellant.

RESPONDENT'S DESIGNATION OF MATTER FOR THE RECORD ON APPEAL

Respondent Bridgett Taylor designates the following to be included in the Record on Appeal with all necessary redactions pursuant to Supreme Court Order 2014-04-15-02:

1. Notice of Appeal, filed April 9, 2020

Orders

2. Order denying Defendant's motion to alter or amend order, filed March 10, 2020
3. Form 4 Order granting Plaintiff's motion to reconsider, filed February 3, 2020
4. Order denying Defendant's motion for summary judgment, filed January 29, 2019
5. Order denying Defendant's motion to reconsider, filed February 27, 2019
6. Order (by email) of Judge Newman on Defendant's motion *in limine*, emailed on March 12, 2019
7. Form 4 Order granting Defendant's motion for directed verdict, filed March 15, 2019

Pleadings

8. Complaint, filed November 3, 2014
9. Answer, filed December 19, 2014
10. Motion for summary judgment, filed September 18, 2018
 - a. Exhibits A and B

11. Notice of motion and motion to amend answer on behalf of Defendant, filed September 19, 2019
12. Plaintiff's Memorandum in opposition to Defendant's motion for summary judgment, filed November 14, 2018
 - a. Exh. 2 – Complaint in Case No. 3:16-3823-JFA-PJG
 - b. Exh. 5 – Search Warrant dated December 18, 2013
 - c. Exh. 12 – photos of Taylor
13. Defendant's Motion to alter or amend and/or motion for reconsideration, filed February 8, 2019
14. Plaintiff's Response in opposition to Defendant's motion to reconsider, filed February 13, 2019
15. Defendant's motion *in limine*, filed March 11, 2019
16. Memorandum in support of motion *in limine* on behalf of Defendant, filed March 11, 2019
17. Motion to Reconsider or, in the alternative, alter or amend the judgment on behalf of Plaintiff, filed March 22, 2019
18. Response in Opposition to Defendant's motion to alter or amend order and/or motion for reconsideration, filed March 5, 2020

Transcripts

19. Transcript of trial March 11, 13-14, 2019: pp. 1-3, 31-72, 90-121, 145-46, 172-204, 217-305, 321-545
 - a. Redact month and day of birth on Tr. p. 272 ln.18

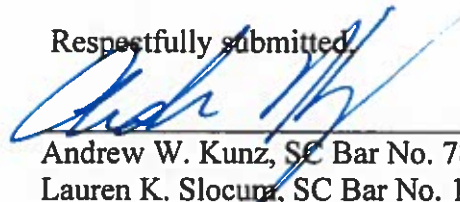
Exhibits

20. Plaintiff's trial exhibit 1 – EMS report
 - a. Redact phone number, month and day of birth, and social security number on p. 1

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

September 14, 2020

Respectfully submitted,



Andrew W. Kunz, SC Bar No. 78261
Lauren K. Slocum, SC Bar No. 101280
ELLIOTT, PHELAN & KUNZ, LLC
Post Office Box 1405
Georgetown, South Carolina 29442
(843) 546-0650
Attorneys for Respondent

From: [Andrew Kunz](#)
To: "Andrew@LDH-Law.com"; "robert@crowelafave.com"
Cc: [Lauren K. Slocum \(lauren@elliottphelanlaw.com\)](mailto:Lauren.K.Slocum@elliottphelanlaw.com); [Jenica Young; "shelley@crowelafave.com"](mailto:Jenica.Young@crowelafave.com)
Subject: Bridgett Taylor v. Richland County Sheriffs Dept. - Brief of Respondent
Date: Monday, September 14, 2020 3:41:00 PM
Attachments: [Initial Brief of Respondent.pdf](#)
[Respondent's Designation of Matter for the Record on Appeal.pdf](#)

Please find attached for electronic service pursuant to Supreme Court Order 2020-05-29-02 Respondent's Initial Brief and Designation of Matter in the above referenced matter.

Thank you,

Andy

Andrew W. Kunz
Elliott, Phelan & Kunz, LLC
117 ½ - 119 ½ Screven St.
P.O. Box 1405
Georgetown, SC 29442
(843) 546-0650
(843) 546-1920 fax
Andrew@elliottphelanlaw.com

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LAW OFFICES OF
ELLIOTT, PHELAN & KUNZ, LLC

117-119 SCREVEN STREET
POST OFFICE BOX 1405
GEORGETOWN, SC 29442

TELEPHONE (843) 546-0650
FAX (843) 546-1920

C. CARTER ELLIOTT, JR.
SEAN T. PHELAN*

carter@elliottphelanlaw.com
sean@elliottphelanlaw.com

*Also admitted to practice in NC & GA

LAUREN KNIGHT SLOCUM
ANDREW W. KUNZ

lauren@elliottphelanlaw.com
andrew@elliottphelanlaw.com

September 14, 2020

Via Electronic Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court for the Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
ctappfilings@sccourts.org

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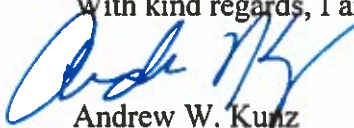
Re: *Bridgett Taylor v. Richland County Sheriff's Department*
Appellate Case No. 2020-000589

Dear Ms. Kitchings:

Attached for electronic filing and service pursuant to section (c)(6) of Supreme Court Order 2020-05-29-02 *RE: Operation of the Appellate Courts During the Coronavirus Emergency*, please find (1) *Initial Brief of Respondent*, (2) *Respondent's Designation of Matter for the Record on Appeal* and (3) *Proof of Service*. Please file the documents and return one file-stamped copy to me via email. By electronic copy of this letter, I am serving all counsel of record with a copy of the same.

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

With kind regards, I am,



Andrew W. Kunz

cc: Lauren K. Slocum (*via email only*)
Robert Garfield (*via email only*)
Andrew Lindemann (*via email only*)