

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 09 2020

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Case No. 2019-CP-2019-CP-23-02476
Appellate Case No. 2020-001051

Thomas C. Skelton..... Appellant,

v.

First Baptist Church of Travelers Rest, South Carolina, a non-profit Corporation Respondent.

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

Appellant Thomas C. Skelton proposes the following matter to be included in the Record on Appeal:

Orders:

1. Order Granting Defendant's Motion for Summary Judgment dated June 18, 2020
2. Order Denying Plaintiff's Motion to Alter or Amend dated July 13, 2020

Pleadings:

1. Complaint dated May 1, 2019
2. Answer and Counterclaim dated May 22, 2019
3. Reply to Counterclaim dated May 30, 2019
4. Amended Answer and Counterclaim dated June 11, 2019

5. First Baptist Church of Travelers Rest's Motion for Summary Judgment dated April 14, 2020
6. Affidavit of Thomas C. Skelton dated June 3, 2020, including Exhibits 1-12
7. Thomas C. Skelton's Memorandum in Opposition to Summary Judgment dated June 8, 2020
8. First Baptist Church of Travelers Rest's Memorandum in Support of Summary Judgment dated June 8, 2020, including Exhibits 1-3
9. Thomas C. Skelton's Supplemental Memorandum in Opposition to Summary Judgment dated June 18, 2020
10. Thomas C. Skelton's Motion to Alter or Amend dated June 26, 2020

Transcripts

1. Transcript of Hearing dated June 11, 2020
2. Transcript of Deposition of Thomas C. Skelton dated March 6, 2020, with Exhibits
3. Transcript of Deposition of Gary Batson dated March 6, 2020, with Exhibits

Certificate of Counsel

The undersigned hereby certifies that this designation contains no matter which is irrelevant to this appeal.

7 OCT., 2020

Bradford N. Martin

Bradford N. Martin, Esq. SC Bar #3658
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Greenville, South Carolina 29603
(864) 552-9990
Attorneys for Appellant
Thomas C. Skelton

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Thomas C. Skelton Appellant,

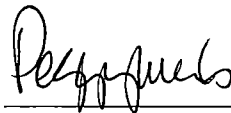
v.

First Baptist Church of Travelers Rest, South Carolina, a non-profit Corporation Respondent.

CERTIFICATE OF SERVICE

I, Peggy McComb, Legal Assistant to attorney for Appellant, certify that I have served a copy of the Initial Brief of Appellant and Appellant's Designation of Matter to be included in the Record on Appeal by depositing a copy in the U.S. Mail, postage prepaid, on October 7, 2020, addressed to attorney of record, O.W. Bannister, Esq., Bannister, Wyatt & Stalvey, LLC, P. O. Box 10007, Greenville, SC 29603.

October 7, 2020



Legal Assistant to
Bradford N. Martin, Esq. (SC Bar No. 3658)
Laura W. H. Teer, Esq. (SC Bar No. 16698)
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October 7, 2020

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *Thomas C. Skelton v. First Baptist Church of Travelers Rest*
Appellate Case No. 2020-001051

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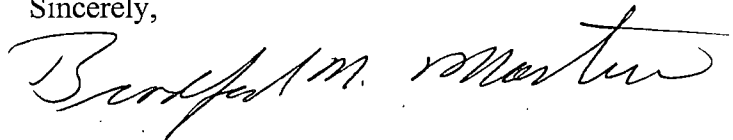
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing is an original and one copy of the Initial Brief of Appellant, Appellant's Designation of Matter to be included in the Record on Appeal, and a Certificate of Service in the above matter. Please file the originals with your Court and return clocked copies in the enclosed envelope.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Bradford N. Martin

/pm
Enclosures

cc: O.W. Bannister, Esq.

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SC Court of Appeals

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The Hon. Jenny Abbott Kitchings
South Carolina Court of Appeals
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