

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 14 2020

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Case No. 2018-CP-40-05124
Appellate Case No. 2020-001065

Trisha Gibbons Respondent,

v.

Aerotek, Inc.....Appellant.

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

Respondent, in addition to the materials previously designated by the Appellant, proposes that the following be included in the Record on Appeal:

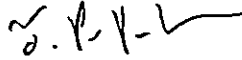
1. Summons and Complaint filed on October 1, 2018.
2. Answer filed on November 21, 2018.
3. Aerotek’s Motion for Summary Judgment and Memorandum in Support filed on September 11, 2019.
4. Form 4 Order Denying Summary Judgment filed on January 3, 2020.
5. Aerotek’s Motion for Attorneys’ Fees and Costs and Memorandum in Support with select exhibits filed on February 13, 2020.
 - Ex. E: Husch Blackwell Attorney Fee Affidavit
 - Ex. F: Nelson Mullins Attorney Fee Affidavit

- Ex. G: Costs Affidavit
6. Form 4 Order Granting Motion for Directed Verdict filed on February 3, 2020.
 7. Memorandum in Opposition to Motion for Attorneys' Fees and Costs with Exhibits filed on March 6, 2020.
 - Ex. 1: Trisha Gibbons Affidavit
 - Ex. 1 to Affidavit: 10/13/17 Email
 - Ex. 2 to Affidavit: 9/14/17 Email
 - Ex. 3 to Affidavit: Acknowledgement of Temporary Work Assignment
 - Ex. 2: 4/5/19 Email Chain
 - Ex. 3: Fee Shifting Agreement
 - Ex. 4 Plaintiff's Offer of Judgment
 - Ex. 5: Contract with Schneider
 - Ex. 6: Partial Stipulation of Dismissal filed 10/29/18
 8. Reply in Support of its Motion for Attorneys' Fees and Costs filed on April 23, 2020.
 9. Order Denying Motion for Attorneys' Fees and Costs filed on June 18, 2020.
 10. Documents Produced by Plaintiff Marked *Gibbons(ppd)150-152*.
 11. Excerpts from Deposition of Plaintiff pp. 17-18.

(Signature and Certification Follow)

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

Respectfully Submitted,



J. Paul Porter, Esquire (# 100723)
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Attorney for Respondent Trisha Gibbons

October 9, 2020
Columbia, South Carolina

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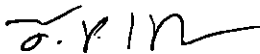
PROOF OF SERVICE

I do hereby certify that on October 9, 2020, I served the Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal by electronic mail and by depositing a copy of the documents in the United States Mail, postage pre-paid, addressed to Appellant’s attorneys of record, at the following addresses:

Patrick D. Quinn, Esquire
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Attorneys and Counselors at Law

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Shannon M. Polvi * Samantha E. Albrecht * Elizabeth M. Bowen * Elizabeth S. Millender

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Via U.S. Mail and E-Mail

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: Trisha Gibbons, Respondent, v. Aerotek, Inc., Appellant
Case No.: 2020-001065

Dear Ms. Kitchings:

Enclosed please find Respondent Trisha Gibbons' Initial Brief, Designation of Matter to be Included in the Record on Appeal, and a Proof of Service.

By copy of this letter we are serving all counsel of record with this filing via U.S. mail and e-mail.

Should you have any questions or concerns, please do not hesitate to give us a call.

With kind regards, I am

Sincerely,



Kate M. Hesik
Litigation Paralegal

/kmh
Enclosures

Cc: Patrick D. Quinn, Esquire
William E. Corum, Esquire
Megan A. Scheiderer, Esquire
Bryson M. Geer, Esquire
Client

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