

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

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Appellate Case No. 2020-001159  
Case No. 2020-CP-40-02040

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**RECEIVED**  
**Nov 16 2020**  
**SC Court of Appeals**

Beacham O. Brooker, Jr., Ellen B. Corontzes;  
and BBB&C Family, LLC,

Respondents,

v.

Julia B. Brooker,

Appellant.

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

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Appellant proposes the following to be included in the Record on Appeal:

1. Petition and Motion to Stay (“Petition”), April 21, 2020
2. Exhibit A to Petition and Motion to Stay, Arbitration Demand of Julia B. Brooker (“Arbitration Demand”), March 17, 2020
3. Exhibit 1 to Exhibit A to Petition and Motion to Stay, Operating Agreement, LLC of BBB&C Family LLC (“Operating Agreement”), January 31, 2014
4. Motion to Dismiss Petition and Motion to Stay, Motion to Compel Arbitration, and Motion for an Award of Attorney’s Fees and Expenses, April 24, 2020
5. Memorandum of Law in Support of Motion to Dismiss Petition and Motion to Stay, Motion to Compel Arbitration, and Motion for an Award of Attorney’s Fees and Expenses, April 24, 2020

6. Exhibit 3 to Motion to Dismiss Petition and Motion to Stay, Motion to Compel Arbitration, and Motion for an Award of Attorney's Fees and Expenses, Acceptance of Service of Arbitration Demand, April 7, 2020
7. Petition and Amended Motion to Stay, April 29, 2020
8. Memorandum in Support of Petition and Amended Motion to Stay and in Opposition to Motion to Dismiss Petition and Motion to Stay, Motion to Compel Arbitration, and Motion for an Award of Attorney's Fees and Expenses ("Pet'rs' Mem."), April 29, 2020
9. Exhibit B to Pet'rs' Mem., Order Calculating Equalization of Distribution of Lifetime Gifts, June 20, 2019
10. Renewed Motion to Dismiss Petition and Amended Motion to Stay, Motion to Compel Arbitration, and Motion for an Award of Attorney's Fees and Expenses, May 1, 2020
11. Memorandum of Law in Support of Renewed Motion to Dismiss Petition and Amended Motion to Stay, Motion to Compel Arbitration, and Motion for an Award of Attorney's Fees and Expenses, May 1, 2020
12. Motion Hearing Transcript, June 24, 2020
13. Petitioners' Proposed Order Granting Motion to Stay, June 30, 2020
14. Appellant's [Proposed] Order, June 30, 2020
15. Order Granting Petitioners' Motion to Stay (the "Order"), July 17, 2020
16. Motion pursuant to Rules 52(b) and 59(a), SCRCPP, to Alter or Amend Order Granting Petitioners' Motion to Stay, July 27, 2020
17. Exhibit A to Motion pursuant to Rules 52(b) and 59(a), SCRCPP, to Alter or Amend Order Granting Petitioners' Motion to Stay (Letter from B. Sowell to J. Griffin, Dec. 12, 2019)
18. Exhibit B to Motion pursuant to Rules 52(b) and 59(a), SCRCPP, to Alter or Amend Order Granting Petitioners' Motion to Stay (B. Brooker Dep., 28:15-30:15, 44:7-25, Jan. 24, 2018)
19. Exhibit C to Motion pursuant to Rules 52(b) and 59(a), SCRCPP, to Alter or Amend Order Granting Petitioners' Motion to Stay (B. Brooker Dep., Ex. 17, Brooker Estate Calculations)
20. Email from A. Sowell to Judge Manning enclosing Proposed Order Denying Motion to Alter or Amend Order Granting Stay of Arbitration Proceeding, August 21, 2020

21. Order Denying Motion to Alter or Amend Order Granting Petitioners' Motion to Stay, August 24, 2020
22. Notice of Appeal, August 24, 2020

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

Respectfully submitted,

November 16, 2020

s/ Badge Humphries

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Attorneys for Appellant

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**PROOF OF SERVICE**

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I hereby certify that I have served the Initial Brief of Appellant, Appellant's Designation of Matter to be Included on the Record on Appeal, and Motion for Expedited Appeal upon the following counsel for Respondents via electronic mail at the email addresses below on this November 16, 2020 (copy of email attached):

Thornwell F. Sowell, III (SC Bar # 5197)  
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**From:** Badge Humphries  
**Sent:** Monday, November 16, 2020 4:29 PM  
**To:** Biff Sowell; Bess DuRant; gculbreath@gwblawfirm.com  
**Cc:** Jim Griffin; Maggie Fox; Badge Humphries; Daphne L. Greve; Jaime Harmon  
**Subject:** Brooker v. Brooker, Appellate Case No. 2020-001159  
**Attachments:** 2020-11-16\_Appellant Initial Brief\_FINAL.pdf; 2020-11-16\_Appellant Desig of Matter\_FINAL.pdf; 2020-11-16\_Motion for Expedited Appeal\_FINAL.pdf

Counsel:

As permitted by part (g)(3) of Supreme Court Order 2020-05-29-02, I am hereby serving via email the Initial Brief of Appellant, Designation of Matter to be Included on the Record on Appeal, and Motion for Expedited Appeal in the above-referenced action. Shortly, I will be filing these documents with the Court of Appeals electronically as permitted by part c(6) of the Order and will attach this email to the proof of service of same.

Sincerely,

Badge

BADGE HUMPHRIES  
ATTORNEY



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**Nov 16 2020**

**SC Court of Appeals**

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