

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2020-001007

RECEIVED

Dec 08 2020

SC Court of Appeals

Joseph Dean, Appellant,

v.

CSX Transportation, Inc., Respondent.

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

Appellant Joseph Dean designates the following to be included in the Record on Appeal
with any necessary redactions pursuant to Supreme Court Order 2014-04-15-02:

1. Notice of Appeal, filed July 16, 2020
2. Order, filed June 17, 2020
3. Complaint, filed April 1, 2020
4. CSX's Motion to Dismiss, filed April 15, 2020
 - a. Exhibit 1, Affidavit of Lauren M. Lamp, filed April 15, 2020
5. Plaintiff's Memorandum in Opposition to Defendant's Motion to dismiss, filed May 22, 2020
 - a. Exhibit 1, Affidavit of Joseph Dean, filed May 22, 2020
 - b. Exhibit 2, CSX business information, filed May 22, 2020
6. CSX's Reply in support of motion to dismiss, filed May 26, 2020
 - a. Exhibit 1, Florida action, filed May 26, 2020

7. Transcript of hearing on May 26, 2020, all pages

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

Respectfully submitted,

Dated: December 8, 2020

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The Honorable Michael G. Nettles

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PROOF OF SERVICE

The undersigned certifies that a copy of the Initial Brief of Appellant and Appellant's Designation of Matter to be Included in the Record on Appeal have been served upon counsel of record for Respondent using their primary email address listed in the Attorney Information System pursuant to the South Carolina Supreme Court's May 29, 2020 Order No. 2020-05-29-02.

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Dated: December 8, 2020

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B A R N E S
LAW FIRM | LLC

Kathleen C. Barnes
Admitted: Georgia | South Carolina

December 8, 2020

Via E-Mail

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

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Re: *Joseph Dean v. CSX Transportation, Inc.*
Appellate Case No. 2020-001007

Dear Mrs. 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 the following:

- (1) Initial Brief of Appellant,
- (2) Appellant's Designation of Matter to be Included in 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 using the email addresses listed in the Attorney Information System.

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

With kind regards, I am,


Kathleen C. Barnes

cc: Ronald K. Wray, II (via email only)
James A. Bradshaw (via email only)
Randolph Murdaugh, IV (via email only)