

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
In the Court of Common Pleas for the Ninth Circuit

The Honorable Roger M. Young, Sr., Circuit Court Judge

Appellate Case No. 2020-001354

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SC Court of Appeals

Susan Brooks Knott Floyd, Respondent

v.

Elizabeth Pope Knott Dross, Appellant

**APPELLANT'S DESIGNATION OF MATTER FOR
INCLUSION IN THE RECORD ON APPEAL**

Jeffrey M. Bogdan, Esq.
John W. Fletcher, Esq.
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and

Joshua S. Whitley, Esq.
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*Counsel for Appellant Elizabeth Pope Knott
Dross*

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Appellant Elizabeth Pope Knott Dross, hereby designates the following materials to be included in the Record on Appeal in this matter. Unless otherwise expressly stated, each item designated is to include *all* attachments or exhibits to the original of the referenced item. Respondent expressly reserves the right to seek supplementation to the record pursuant to Rules 209 and 212, SCACR. Appellant designates the following matters for inclusion in the Record on Appeal:

1. September 20, 2019 Complaint
2. November 22, 2019 Amended Complaint
3. December 5, 2019 Answer to Amended Complaint
4. July 15, 2020 Motion for Partial Summary Judgment (including all Exhibits or attachments thereto)
5. July 15, 2020 Affidavit of Susan Brooks Knott Floyd in Support of Plaintiff's Motion for Partial Summary Judgment (including all Exhibits or attachments thereto)
6. August 24, 2020 Defendant's Memorandum in Opposition to Plaintiff's Motion for Partial Summary Judgment (including all Exhibits or attachments thereto)
7. August 27, 2020 Supplemental Affidavit of Susan Floyd in Support of her Motion for Partial Summary Judgment (including all Exhibits or attachments thereto)
8. August 31, 2020 Transcript of Proceedings
9. September 11, 2020 Order Granting Plaintiff's Motion for Partial Summary Judgment
10. September 11, 2020 Form 4 Judgment in a Civil Case
11. September 17, 2020 Defendant's Motion to Alter or Amend Judgment
12. October 2, 2020 Order Denying Defendant's Motion to Alter or Amend Judgment
13. October 9, 2020 Notice of Appeal (including all Exhibits or attachments thereto)

Appellant certifies, pursuant to S.C.A.C.R., Rule 209(c), that the designations set forth above are relevant to the appeal in this matter, and that she has not designated any matter which is irrelevant to the issues before the Court.

January 4, 2021

By: 

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In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
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Appellate Case No. 2020-001354

Susan Brooks Knott Floyd, Respondent

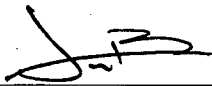
v.

Elizabeth Pope Knott Dross, Appellant

PROOF OF SERVICE

I certify that I have served the Designation of Matter for Inclusion in the Record on Appeal on the above-referenced Respondent by depositing a copy of it in the United States Mail, postage prepaid, on January 4, 2021, addressed to her attorneys of record:

G. Trenholm Walker, Esq.
Charles P. Summerall, IV, Esq.
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Charleston, SC 29413
Attorneys for Respondent Susan Brooks Knott Floyd

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ATTORNEYS AT LAW

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MEMBER ATTORNEY

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January 4, 2021

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SC Court of Appeals

VIA EMAIL and U.S. MAIL

2823.011

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: Susan Brooks Knott Floyd, Respondent vs. Elizabeth Pope Knott Dross, Appellant.
Appellate Case No.: 2020-001354

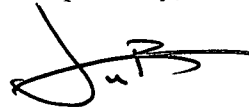
Dear Ms. Kitchings:

Please find enclosed for filing the unbound original *Appellant's Initial Brief and Designation of Matter* in the above-referenced matter. Pursuant to the Supreme Court's Amended Order "re: Operation of the Appellate Courts During the Coronavirus Emergency," I have not included any additional copies.

By copy of this correspondence, I am serving copies of the Brief and Designation of Matter on all counsel of record.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully,



Jeffrey M. Bogdan

JMB/jas
enclosures

c: Charles P. Summerall, IV, Esq.
G. Trenholm Walker, Esq.

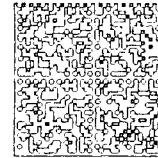
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Clerk of Court, South Carolina Court of Appeals
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