STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Jan 27 2021
SC Court of Appeals

Appeal from Richland County
Court of Common Pleas

Jocelyn Newman, Circuit Judge

Case No. 2018-CP-40-04219
Appeal No. 2020-001242

Joelle Snyder,

Appellant,

v.

City of Columbia, Barton-Malow Company, Contract Construction, Inc., Construction Dynamics Incorporated, Enviro AgScience, Inc., C.R. Jackson, Inc., Bull Street Development, LLC, John Doe No. 1, John Doe No. 2, John Doe Company No. 3,

Defendants,

of which Barton-Malow Company, Contract Construction, Inc. and Construction Dynamics, Inc. are the Respondents.

RESPONDENTS' DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 209, SCACR, Respondents designate the following items for inclusion in the Record on Appeal:

1. Trial Docket Entries/Index;

2. Complaint, filed August 9, 2018;

3. Answer of Barton-Malow Company, Contract Construction, Inc. and Construction Dynamics, Inc., filed October 10, 2018;

4. Amended Answer of Barton-Malow Company, Contract Construction, Inc. and Construction Dynamics, Inc., filed October 19, 2018;

5. Scheduling Order, filed May 30, 2019;

6. Motion to Compel, filed August 12, 2019;

7. Email from Attorney Senn re: motion to compel resolved, filed November 6, 2019;

8. Plaintiff's Motion to Amend, filed February 4, 2020;

9. Amended Complaint, filed March 9, 2020;

10. Motion for Summary Judgment by Barton-Malow Company, Contract Construction, Inc. and Construction Dynamics, Inc., filed July 15, 2020 with Supporting memorandum and exhibits;

11. Plaintiff's Memorandum in Opposition to Summary Judgment, filed August 10, 2020, with supporting exhibits August 10, 2020;

12. Entire Transcript, Motion Hearing, August 12, 2020;

13. Form 4 order, filed August 13, 2020;

14. Formal order, filed August 17, 2020; and

15. Voluntary Dismissal of Enviro AgScience, filed September 22, 2020.

The undersigned certifies that this Designation contains no material which is irrelevant to the appeal.

HOOD LAW FIRM, LLC

Jennifer F. Nutter (SC #69348)
Maryrose L. Pritchard (SC #102804)
Deborah Harrison Sheffield, Of Counsel (SC #2757)
172 Meeting Street
Post Office Box 1508
Charleston, SC 29402
Phone: (843) 577-4435 Facsimile: (843) 722-1630
Info@hoodlaw.com

s/ Jennifer F. Nutter
jennifer.nutter@hoodlaw.com

Attorneys for the Defendants
Barton Malow Company, Contract Construction, Inc., and Construction Dynamics, Inc.

January 27, 2021

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
Jan 27 2021
SC Court of Appeals

Appeal from Richland County
Court of Common Pleas

Jocelyn Newman, Circuit Judge

Case No. 2018-CP-40-04219
Appeal No. 2020-001242

Joelle Snyder,

Appellant,

v.

City of Columbia, Barton-Malow Company, Contract Construction, Inc., Construction Dynamics Incorporated, Enviro AgScience, Inc., C.R. Jackson, Inc., Bull Street Development, LLC, John Doe No. 1, John Doe No. 2, John Doe Company No. 3,

Defendants,

of which Barton-Malow Company, Contract Construction, Inc. and Construction Dynamics, Inc. are the

Respondents,

Certificate of Service

The undersigned certifies that on this **27th** day of **January, 2021**, a copy of the Initial Brief and Designations on behalf of Respondents Barton-Malow Company, Contract Construction, Inc. and Construction Dynamics, Inc., were served by emailing a copy of each, on the following counsel at the addresses listed below:

Karlen K. Senn, Esquire
Mike Kelly Law Group, LLC
500 Taylor Street, 4th Floor (29201)
Post Office Box 8113
Columbia, SC 29202
P: 803-726-0123
KSenn@mklawgroup.com

HOOD LAW FIRM, LLC

Jennifer F. Nutter (SC #69348)
Maryrose L. Pritchard (SC #102804)
Deborah Harrison Sheffield, Of Counsel (SC #2757)
172 Meeting Street
Post Office Box 1508
Charleston, SC 29402
Phone: (843) 577-4435 / Fax: (843) 722-1630
Info@hoodlaw.com

/s/ Jennifer F. Nutter
Attorneys for the Defendants
Barton Malow Company, Contract Construction, Inc., and Construction Dynamics, Inc.

HOOD LAW FIRM LLC

JENNIFER F. NUTTER
Partner
DIRECT DIAL: (843) 577-1214
E-MAIL: jennifer.nutter@hoodlaw.com

January 27, 2021

RECEIVED
Jan 27 2021
SC Court of Appeals

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

Re: Joelle Snyder v. Barton-Malow Company
Appellate Case No. 2020-001242
HLF File No. 290.027

Dear Ms. Kitchings:

Enclosed please find the Respondents' Initial Brief and Respondents' Designation of Matters to Be Included in the Record on Appeal in the above captioned matter. Also enclosed herewith is the Certificate of Service. I am serving all other counsel of record by emailed copy of this letter.

Kind regards,

Yours truly,

/s/ Jennifer F. Nutter

Jennifer F. Nutter

JFN/jad
Enclosure(s)
cc [***Via E-Filing***]: Karlen K. Senn, Esquire