

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Mar 05 2021

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

SC Court of Appeals

Roger M. Young, Sr., Circuit Court Judge

Appellate No. 2020-001354

Susan Brooks Knott FloydRespondent

v.

Elizabeth Pope Knott DrossAppellant

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

Pursuant to Rule 209, SCACR, Respondent hereby designates the following material to be included in the Record on Appeal, in addition to the material designated by Appellant:

1. Lis Pendens filed September 20, 2019.
2. Plaintiff's Reply to Defendant's Counterclaim filed December 20, 2019.
3. Plaintiff's Reply to Defendant's Memorandum in Opposition to Plaintiff's Motion for Partial Summary Judgment filed August 27, 2020 (Appellant designated Exhibit 1 to Plaintiff's Reply, the August 27, 2020 Supplemental Affidavit of Susan Floyd in Support of her Motion for Partial Summary Judgment, including all Exhibits or attachments thereto, but not Plaintiff's Reply itself).
4. Plaintiff's Memorandum in Opposition to Defendant's Motion to Alter or Amend Order Granting Partial Summary Judgment filed September 29, 2020.

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

Charles P. Summerall IV

G. Trenholm Walker, S.C. Bar No. 5777

Charles P. Summerall, IV, S.C. Bar No. 5433

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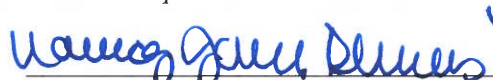
PROOF OF SERVICE

I certify that I have served the **Initial Brief of Respondent and Respondent's Designation of Matter To Be Included In The Record On Appeal** on the Appellant Elizabeth Pope Knott Dross, via electronic mail, on **March 5, 2021**, addressed to her attorneys of record at the following addresses:

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Attorneys for Appellant Elizabeth Pope Knott Dross



Nancy Jane Dennis
Paralegal

From: [Nancy Jane Dennis](#)
To: jwhitley@smythwhitely.com; [Jeffrey Bogdan](#); [John Fletcher](#)
Cc: [Trenholm Walker](#); [Charles P. Summerall, IV](#)
Subject: Floyd v. Dross
Date: Friday, March 5, 2021 1:38:10 PM
Attachments: [image073990.png](#)
[03-05-21 Initial Brief of Respondent.pdf](#)
[03-05-21 Proof of Service.pdf](#)
[03-05-21 DOM.pdf](#)

Attached please find Respondent's Initial Brief and Designation of Matter with Proof of Service.

Nancy Jane
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March 5, 2021

VIA EMAIL

The Honorable Jenny Abbott Kitchings
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Mar 05 2021

SC Court of Appeals

Re: Susan Brooks Knott Floyd, Respondent v. Elizabeth Pope Knott Dross, Appellant
Appellate Case No.: 2020-001354
WGFL File: 8185-001

Dear Ms. Kitchings:

Please find attached Respondent's Initial Brief and Designation of Matter in the above-referenced matter with Proof of Service by electronic mail only.

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

Sincerely,

WALKER GRESSETTE FREEMAN & LINTON, LLC

A handwritten signature in blue ink that reads "Charles P. Summerall, IV".

Charles P. Summerall, IV

cc: G. Trenholm Walker, Esq. (email only)
Jeffrey M. Bogdan, Esq. (email only)
John Fletcher, Esq. (email only)
Joshua Steven Whitley, Esq. (email only)