

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 10 2021

APPEAL FROM GREENVILLE COUNTY SC Court of Appeals
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Case No. 2020-CP-23-01669
Appellate Case No. 2020-001182

Sean Eric Roach Respondent,

v.

Lee C. Yarborough Appellant.

RESPONDENT'S DESIGNATION OF MATERIAL TO BE INCLUDED IN
RECORD ON APPEAL

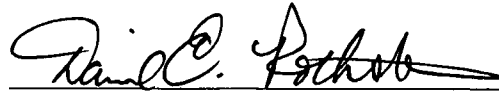
Respondent, Sean Eric Raoch, by and through his undersigned counsel, hereby proposes the following to be included in the Record on Appeal, in addition to the documents identified in Appellant's Designation of Matter to Be Included in Record on Appeal:

1. Defendant's Motion to Dismiss under Rule 12(b)(8), SCRCPP, with copy of federal complaint and exhibits in Propel PEO, Inc. et al. v. Roach et al., C/A No. 6:19-cv-03546-HMH-KFM (filed in magistrate's court Feb. 28, 2020);
2. Affidavit of Sean Eric Roach, with Exhibits A & B (filed March 9, 2020) (also filed as Ex. 1 to Brief of Appellant filed in Circuit Court on July 17, 2020)
3. Matter Overview (4 pages) and one-page document from Lee Yarborough (field as Ex. 2 to Brief of Appellant filed in Circuit Court on July 17, 2020) (redact personal phone numbers and addresses in document)

* * *

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

March 8, 2021



David E. Rothstein, SC Bar No. 66295
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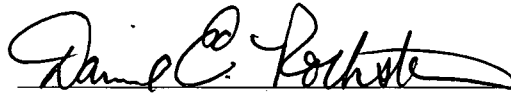
v.

Lee C. Yarborough Appellant.

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 Appellant, Lee C. Yarborough, by depositing a copy of the same in the United States Mail, postage prepaid, on March 8, 2021, addressed to Appellant's attorney of record, Wesley D. Few, Esq., Wesley D. Few, LLC, P.O. Box 9398, Greenville, SC 29604.

March 8, 2021



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SC Court of Appeals

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Sean Eric Roach v. Lee C. Yarborough,
Appellate Case No. 2020-001182

Dear Ms. Kitchings:

Enclosed please find the original and one copy each of the Initial Brief of Respondent, Respondent's Designation of Material to be Included in Record on Appeal, and Proof of Service in the above-referenced case. Please file the original and one copy of each of these documents and return the extra copies, clocked in, to me via the enclosed return envelope.

By copy of this letter, I am hereby serving a copy of the Initial Brief of Respondent on counsel for Appellant.

Thank you in advance for your attention to this matter. If you have any questions or need anything else, please do not hesitate to call me or email me.

Sincerely yours,

David E. Rothstein

Enclosures

cc: Wesley D. Few



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SC Court of Appeals

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