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Apr 23 2021

SC Court of Appeals

**FORM 14
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2020-001525

JAMES EARL TEGELER,

Appellant,

v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
COLLIER, LINDA SMITH,
NORTHGATE BAPTIST
CHURCH,

Respondents.

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

Appellant James Earl Tegeler proposes the following to be included in the Record on Appeal:

1. Summons and Complaint filed by Appellant on February 25, 2020;
2. Motion to Dismiss filed by Respondent Northgate Baptist Church on March 25, 2020;
3. Amended Answer filed by Respondent Charlotte Collier on April 2, 2020;
4. Motion to Dismiss filed by Respondent Charlotte Collier on April 2, 2020;
5. Amended Answer filed by Respondents Hannah Elizabeth Collier and Linda Smith on April 27, 2020;

6. Motion for Judgment on the Pleadings and Motion to Dismiss filed by Respondents Hannah Elizabeth Collier and Linda Smith on April 7, 2020;
7. Memorandum in Support of Motion to Dismiss filed by Respondent Northgate Baptist Church on August 13, 2020;
8. Memorandum in Support of Motion to Dismiss filed by Respondent Charlotte Collier on August 14, 2020;
9. Memorandum in Support of Motion to Dismiss and Motion for Summary Judgment on the Pleadings by Respondents' Hannah Elizabeth Collier and Linda Smith on August 17, 2020;
10. Response to Respondents' Motion to Dismiss filed by Appellant on August 17, 2020;
11. Affidavit of Hannah Elizabeth Collier filed on August 17, 2020;
12. Decision granting Respondent Linda Smith's motion to dismiss and motion for judgment on the pleadings on August 18, 2020;
13. Decision granting Respondent Charlotte Collier's motion for judgment on the pleadings on August 18, 2020;
14. Decision granting Respondent Northgate Baptist Church's motion to dismiss on August 18, 2020;
15. Transcript from Respondents' motion to dismiss hearing on August 18, 2020, pp. 1-59;
16. Amended Decision granting Respondents' Linda Smith and Hannah Elizabeth Collier's motion to dismiss and motion for judgment on the pleadings on August 20, 2020;
17. Appellant's Motion for Reconsideration to Alter or Amend a Judgment and Motion for Relief from Judgment filed on August 28, 2020.
18. Affidavit of Josie Allen filed by Appellant on August 28, 2020;
19. Affidavit of Anne Danciu filed by Appellant on August 28, 2020;
20. Affidavit of Caroline Jenkins filed by Appellant on August 28, 2020;
21. Affidavit of Sue Lutz filed by Appellant on August 28, 2020;
22. Affidavit of Roy Sabeau filed by Appellant on August 28, 2020;
23. Affidavit of James Earl Tegeler filed by Appellant on August 28, 2020;
24. Order granting a motion for judgment on the pleadings for Respondents Hannah Elizabeth Collier and Linda Smith on September 8, 2020;
25. Order granting a motion to for judgment on the pleadings for Respondent Charlotte Collier on

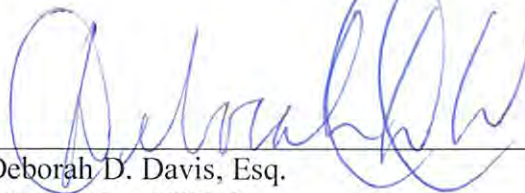
September 8, 2020;

26. Order granting a motion to dismiss for Respondent Northgate Baptist Church on September 8, 2020;
27. Appellant's Amended Motion for Reconsideration to Alter or Amend a Judgment and Motion for Relief from Judgment filed on September 14, 2020.
28. Order denying Appellant's Amended Motion for Reconsideration to Alter or Amend a Judgment as to Respondent Charlotte Collier on November 9, 2020;
29. Order denying Appellant's Amended Motion for Reconsideration to Alter or Amend a Judgment as to Respondent Northgate Baptist Church on November 9, 2020; and,
30. Order denying Appellant's Amended Motion for Reconsideration to Alter or Amend a Judgment as to Respondents Hannah Elizabeth Collier and Linda Smith on November 10, 2020

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

Respectfully submitted this 23 day of April , 2021 .

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ATTORNEYS FOR THE RESPONDENTS

**PROOF OF SERVICE OF INITIAL BRIEF OF APPELLANT AND
DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Case No. 2020-001525

JAMES EARL TEGELER,

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v.

CHARLOTTE COLLIER,
HANNAH ELIZABETH
COLLIER, LINDA SMITH,
NORTHGATE BAPTIST
CHURCH,

Respondents.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal on Respondents **CHARLOTTE COLLIER, HANNAH ELIZABETH COLLIER, LINDA SMITH, and NORTHGATE BAPTIST CHURCH** electronically and by depositing a copy of it in the United States Mail, postage prepaid, or by South Carolina Supreme Court Order 2020-05-29-02, on April 23, 2021, addressed to the attorney of record, to the following address(es):

Northgate Baptist Church
c/o Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
Charles E. McDonald & S. Michael Nail
300 North Main Street
P.O Box 2757

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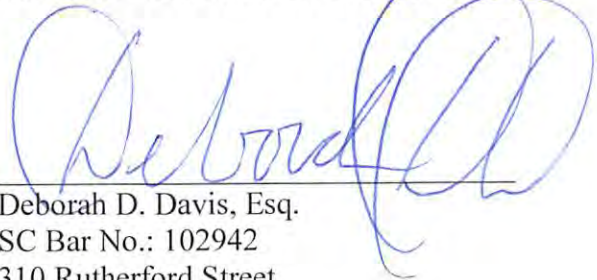
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Respectfully submitted this 23 day of April , 2021 .

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NOTICE OF MOTION INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL

April 23, 2021

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

VIA EMAIL CTAPPFILINGS@SCCOURTS.ORG

Re : Tegeler v. Collier et al.
Case No. : 2020-CP-23-01213
Appellate Case No. : 2020-001525
File Id. : 2018-01-123

Dear Clerk of Court:

Please see the enclosed the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal.

Please let me know what further you require from me at this time. Thank you for assistance with this matter.

Respectfully submitted this 23 day of April, 2021.

Deborah D. Davis, Esq.
SC Bar No.: 102942
Attorney for Appellant

cc: Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
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