

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

**RECEIVED**

JUN 24 2021

APPEAL FROM ORANGEBURG COUNTY

**SC Court of Appeals**

Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Case No. 2019-CP-38-00786

Appellate Case No. 2021-000336

Kevin Reid and LaDonna Rowland,

*Plaintiffs,*

v.

Robert Bethea, III d/b/a Bethea's Funeral Home, Bethea Funeral Home, LLC d/b/a Bethea's Funeral Home, Belleville Memorial Gardens of SC, Inc. d/b/a Belleville Memorial Gardens, Belleville Memorial Gardens, LLC, Crestlawn Memorial Cemetery of SC, Inc. d/b/a Crestlawn Memorial Gardens, and Crestlawn Memorial Gardens, LLC,

*Defendants,*

Of which LaDonna Rowland is the

*Respondent,*

and

Belleville Memorial Gardens of SC, Inc. d/b/a Belleville Memorial Gardens, LLC is the

*Appellant.*

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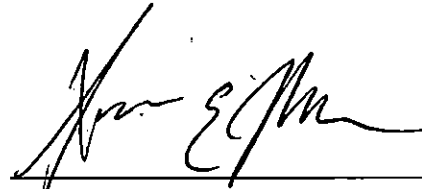
**RESPONDENT'S DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD ON APPEAL**

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*Respondent hereby proposes the following be included in the Record on Appeal:*

- Any matters designated by Appellant;
- Complaint;
- Answer of Belleville Memorial Gardens of SC, Inc. d/b/a Belleville Memorial Gardens, LLC;
- Interment Agreement;
- Belleville's Interrogatories to the Plaintiffs;
- Belleville's R4P to the Plaintiffs;
- Plaintiffs' Answers to Belleville's Interrogatories;
- Plaintiff's Responses to Belleville's Request for Production.
- Deposition of Plaintiff Rowland;
- Deposition of Plaintiff Reid; and
- Deposition of Robert Bethea, III.

*I hereby certify, pursuant to Rule 209(c), SCRAP, that this designation contains no matter which is irrelevant to this appeal.*



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Andrew E. Haselden  
HOWSER, NEWMAN & BESLEY, LLC  
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*Defendants,*

Of which LaDonna Rowland is the

*Respondent,*

and

Belleville Memorial Gardens of SC, Inc. d/b/a Belleville Memorial Gardens, LLC is the

*Appellant.*

---

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

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I, the undersigned employee of Howser Newman & Besley, LLC, hereby certify that pursuant to Rules 209(a) and 262(b), SCACR, I have served the ***Respondent's Designation of Matter to Be Included in the Record on Appeal*** in this matter on all counsel of record by mailing a copy, United States Mail, postage prepaid, on June 22, 2021, to the following addresses:

Stephen D. Porter  
Kevin Maroney  
ROGERS, LEWIS, JACKSON, MANN & QUINN, LLC  
P.O. Box 11803  
Columbia, SC 29211  
***Attorney for Appellant***

  
\_\_\_\_\_  
HOWSER, NEWMAN & BESLEY, LLC

R. Davis Howser  
James P. Newman, Jr. <  
Benjamin D. McCoy ^  
Kelley Shull Cannon ^  
Andrew E. Haselden <  
George V. Hanna, IV \*  
Michal Cooper Jones  
Kyliene L. Keesley ^  
Albert Richard Pierce, Jr. \*  
James P. Sullivan  
Jeffrey I. Silverberg  
Andrew L. Hethington

# HNB

## HOWSER, NEWMAN & BESLEY, LLC

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William G. Besley (1964–2018)

< Certified Circuit Court Mediator  
^ Certified Circuit Court Mediator and Arbitrator  
\* Also Admitted in North Carolina

June 22, 2021

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

**RECEIVED**  
JUN 24 2021  
SC Court of Appeals

**RE:** Reid & Rowland v. Bethea, et al.  
C/A No.: 2019-CP-38-786  
Appellate Case No.: 2021-336

Dear Ms. Kitchings:

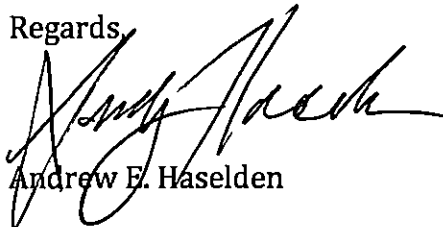
Enclosed for filing are an original and two (2) copies each of the following documents in the above-captioned action:

- *Initial Brief of Respondent;*
- *Proof of Service* with respect to the Initial Brief;
- *Respondent's Designation of Matter to be Included in the Record on Appeal;* and
- *Proof of Service* with respect to the Designation.

Please return the filed copies via the enclosed envelope.

By copy of this letter, I am serving all parties to the appeal with copies of each of the above-described documents via their attorneys of record. Thank you for your assistance in this matter and please do not hesitate to contact me with any questions or concerns.

Regards,



Andrew E. Haselden

AEH/elh

cc: Stephen D. Porter, Esquire  
Kevin Maroney, Esquire

H  
BESLEY  
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FIRST CLASS



**HB**  
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& BESLEY, LLC  
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