

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

RECEIVED

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

JUL 20 2021
SC 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;
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;
31. Initial Brief of Appellant filed on April 23, 2021;
32. Initial Brief of Respondent Northgate Baptist Church filed on May 21, 2021;
33. Initial Brief of Respondent Charlotte Collier filed on May 21, 2021; and,
34. Initial Brief of Respondent Hannah Elizabeth Collier and Linda Smith filed on July 8, 2021.

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

Respectfully submitted this 16 day of July , 2021

DICKSON DAVIS LAW FIRM, LLC



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ATTORNEYS FOR THE RESPONDENTS

**PROOF OF SERVICE OF DESIGNATED MATTER FOR INITIAL
REPLY BRIEF OF APPELLANT**

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-CP-23-01213

JAMES EARL TEGELER,

Appellant,

v.

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

Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Designated Matter for Initial Reply Brief of Appellant on Respondents **CHARLOTTE COLLIER, HANNAH ELIZABETH COLLIER, LINDA SMITH, 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 July 16, 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
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Respectfully submitted this 16 day of July, 2021.

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ATTORNEY FOR APPELLANT



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**NOTICE OF DESIGNATED MATTER FOR
INITIAL REPLY BRIEF OF APPELLANT**

July 16, 2021

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SC Court of Appeals

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

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 Designated Matter for the Initial Reply Brief of Appellant.

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

Respectfully submitted this 16 day of July, 2021

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

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