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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2020-001643
Circuit Court Case No. 2016-CP-10-05379

The Estate of Delila Parrott,

Respondent

v.

Sandpiper Independent and Assisted Living-Delaware, LLC,

Appellant.

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

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

D. Jay Davis, Jr. (SC Bar No. 12084)

Russell G. Hines (SC Bar No. 72100)

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Attorneys for Appellant

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

Appellant, Sandpiper Independent and Assisted Living-Delaware, LLC, proposes the following to be included in the Record on Appeal:

Orders, Judgments, Decrees, or Decisions

1. Order, filed October 16, 2020;
2. Form 4 Judgment in Favor of Plaintiff, filed October 16, 2020;
3. Order denying Motion to Reconsider, filed November 18, 2020;

Pleadings

4. Summons and Complaint, filed October 11, 2016;
5. Amended Summons and Complaint, filed December 21, 2016;
6. Answer to Amended Complaint by Appellant, filed January 18, 2017;
7. Amended Summons and Complaint, filed December 11, 2019;
8. Answer to Amended Complaint by Appellant, filed December 26, 2019;

Transcripts

9. Deposition Transcript of Lila Watters, February 2, 2017;
10. Deposition Transcript of Lawrence Bergmann, Ph.D., June 25, 2020, with exhibits;
11. Transcript of Record, September 8, 2020;
12. Transcript of Record, September 9, 2020;
13. Transcript of Record, September 10, 2020;
14. Motion to Reconsider Hearing Transcript, November 4, 2020;

Other materials or documents

15. Lease Agreement, signed April 26, 2013;
16. Plaintiff's Pre-Trial Brief, August 28, 2020;
17. Sandpiper Village Independent Living's Trial Brief, August 31, 2020;
18. Motion to Reconsider, filed October 26, 2020;
19. AT&T Phone Records; and
20. Notice of Appeal and Proof of Service filed with Charleston County Clerk of Court, December 17, 2020.

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

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Stephen L. Brown
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