

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Civil Action No.: 2010-CP-30-0116

Willie D. Watson Appellant.

v.

Nancy Carol Underwood, individually and as putative trustee of the
Willie D. Watson Trust; John H. Watson, individually and as putative
trustee of the Willie D. Watson Trust; and Future and Potential Heirs
of Willie D. Watson Respondents.

RESPONDENTS' AMENDED DESIGNATION OF MATTER TO
BE INCLUDED IN THE RECORD ON APPEAL

Respondents designate the following particular documents to be included in the Record on Appeal:

1. Appellant's designations;
2. Affidavit of Nancy Underwood, dated May 13, 2010, including incorporated exhibits;
3. Affidavit of John Watson, dated May 17, 2010, including incorporated exhibits;
4. Irrevocable Trust Agreement dated April 2, 2009;
5. Incident Report (Exhibit 6 to the Townsend depo. and Exhibit 1 to Appellant's deposition);
6. John Calvin Watson power of attorney (Exhibit 9 to Appellant's deposition);

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7. Dr. Robinson's statement dated April 23, 2009 (Exhibit 11 to Appellant's deposition.);
8. Customer Agreement dated May 6, 2009 (Exhibit 12 to Appellant's deposition.);
9. June 18, 2009 incident report (Exhibit 14 to Appellant's deposition.);
10. Richard Townsend Deposition Transcript:
Vol. 1
Pages: 2-12, 18, 28-32, 36, 46-48, and 55;
Vol. 2
Pages: 1-15
11. Appellant's Deposition Transcript:
Pages: 3-5, 15-19, 26-27, 79-84, 98-99.
12. Respondents' Return to Plaintiff's Petition/Motion to Terminate Trust dated July 6, 2010;
13. Respondents' Motion for Partial Summary Judgment dated and served July 19, 2011.



B. Michael Brackett, Bar No. 838
Moses & Brackett, PC
P. O. Box 100261
Columbia, SC 29202
803.461.2312
Attorney for Respondents

March 25, 2013

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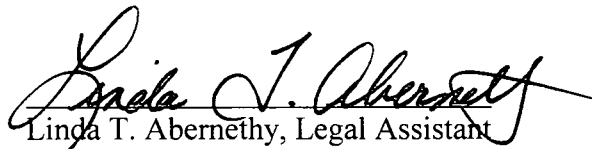
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of Willie D. Watson Respondents.

PROOF OF SERVICE

I, Linda T. Abernethy, Legal Assistant to B. Michael Brackett, Esquire, attorney for the Respondents in the above-captioned matter, do hereby certify that I have served counsel for the Appellant with a copy of **Proposed Consent Order allowing Respondents to file and serve an Amended Designation of Matter to be Included in the Record on Appeal, and Respondents' Amended Designation of Matter to be Included in the Record on Appeal**, by United States Mail, postage prepaid and return address clearly indicated on said envelope, on this 25th day of March, 2013, at the following addresses:

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Served: T. Jeff Goodwyn, Jr., Esquire
2519 Devine Street
Suite A
Columbia, SC 29205
Attorney for Appellant


Linda T. Abernethy, Legal Assistant
Moses & Brackett, PC