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OCT 29 2021
SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SALUDA COUNTY
Court of Common Pleas

The Honorable Alison Renee Lee, Circuit Judge

Civil Action No. 2016-CP-41-00153

Carr Farms, Inc. and Titan Farms, LLC,Appellant

v.

Susannah Smith Watson, Carson M. Watson,
and Jane Watson.....Respondent

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

Appellant proposes the following to be included in the Record on Appeal. Where opposing motions include reference to the same exhibits, only one copy of the subject exhibit will be included in the actual Record. These exhibits are identified individually below for ease of identification:

1. Order Denying Plaintiff's and Defendants' Motion for Partial Summary Judgment dated September 21, 2018;
2. Order Granting Defendant's Motion for Partial Summary Judgment dated July 26, 2019;
3. Order on Reconsideration dated May 26, 2021;
4. Complaint (2016-CP-41-153) filed July 20, 2016;
5. Amended Answer and Counterclaims of Susannah Smith Watson filed August 24,

- 2016;
6. Reply to Counterclaims filed September 30, 2016;
 7. Defendant's Notice of Motion and Motion for Summary Judgment filed January 3, 2018 (including exhibits A-I which are also identified below);
 8. Plaintiffs' Response in Opposition to Defendant's Motion for Partial Summary Judgment and Cross Motion for Partial Summary Judgment filed February 2, 2018 (including exhibits 1-10 which are also identified below);
 9. Defendant's Memorandum in Opposition to Plaintiffs' Motion for Partial Summary Judgment filed March 12, 2018;
 10. Plaintiffs' Motion to Reconsider filed August 5, 2019;
 11. Defendant's Amended Reply to Motion to Reconsider filed November 19, 2019;
 12. Transcript of Hearing on July 30, 2018;
 13. Conveyance from Mattie Lee Bonnette to F. Broadus Smith (Book 50, page 291);
 14. Agreement between F. Broadus Smith and D.C. Abney (Book 11, page 199);
 15. Conveyance from Mattie L. Bonnette to Jean B. Holston (Book 76, page 148);
 16. Conveyance from Jean B. Holston to Sarah B. Swartz (Book 415, page 276);
 17. Conveyance from Sarah B. Swartz to E. Phillips Boatwright (Book 418, page 44);
 18. Conveyance from Eleanor S. Quattlebaum to E. Phillips Boatwright (Book 527, page 249);
 19. Conveyance from E. Phillips Boatwright to Carey Edward Frick (Book 579, page 164);
 20. Conveyance from Carey Edward Frick to Titan Farms, LLC (Book 966, page 104);
 21. Conveyance from D.C. Abney to Carr Farms, Inc. (Book 913, page 276);

22. Plat dated January 6, 1971 (and recorded at Book 1014, page 60)
23. Plat dated November 4, 2002;
24. Plat dated June 18, 2004;
25. Plat dated December 3, 2013 (and recorded at Book A-136, page 12)
26. Plat dated November 4, 2016;

Respectfully Submitted,

s/ Jonathan M. Milling
Jonathan M. Milling
MILLING LAW FIRM, LLC
2910 Devine Street
Columbia, South Carolina 29205
(803) 451-7700
Attorneys for Appellant

October 27, 2021

STATE OF SOUTH CAROLINA

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APPEAL FROM SALUDA COUNTY

SC Court of Appeals

Court of Common Pleas

The Honorable Alison Renee Lee, Circuit Judge

Civil Action No. 2016-CP-41-00153

Appellate Case No. 2021-000659

Carr Farms, Inc. and Titan Farms, LLC,Appellant

v.

Susannah Smith Watson, Carson M. Watson,

and Jane Watson.....Respondent

CERTIFICATE OF SERVICE

I certify that I have served a copy of *Designation of Matter to be Included in the Record on Appeal* by depositing a copy of the same in United States Mail, postage prepaid, on October 27, 2021, to Appellants' Attorney of record, listed herein:

Daniel L. Draisen, Esquire
2006 N. Main Street
Anderson, South Carolina 29621
(864) 888-8887
Attorney for Respondent

s/ Jonathan M. Milling
Jonathan M. Milling

October 27, 2021



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Attn: Clerk of Court
South Carolina Court of Appeals
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Columbia, SC 29211

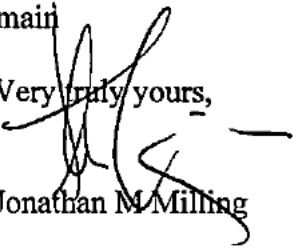
RE: Initial Brief of the Appellant Case No. 2021-000659

Dear Clerk Kitchings:

Enclosed please find one (1) original Designation of Matter to be Included in the Record on Appeal to be filed in the above referenced matter, as well as a corresponding Certificate of Service. It was previously filed electronically. Should you have any questions, please do not hesitate to contact me.

With kind regards, I remain

Very truly yours,


Jonathan M. Milling

Cc: Daniel Draisen, Esquire



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