

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

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Civil Action No.: 2010-CP-32-03172

Appellate Case No.: 2012-212705

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Martha Goodwyn,..... Respondent

v.

Shadowstone Media, Inc. and Robert Pachaly,..... Appellant

**RECEIVED**

APR 04 2013

**SC Court of Appeals**

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

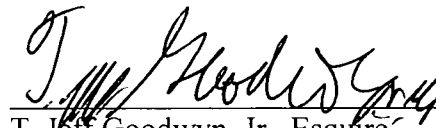
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Pursuant to Rule 209, SCACR, the Respondent proposes the following items be included in the Record on Appeal:

1. Portions of the trial transcript including the testimony of Martha D. Goodwyn and Robert Pachaly;
2. Portions of the trial transcript including Respondent's Motions for treble damages and attorney's fees (pp. 283-286).

Pursuant to Rule 209(c), SCACR, I certify that this Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. Jeff Goodwyn, Jr.", written over a horizontal line.

T. Jeff Goodwyn, Jr., Esquire  
Goodwyn Law Firm, LLC  
2519 Devine Street  
Suite A  
Columbia, SC 29205  
(803) 251-4517  
Attorney for Respondent

Columbia, South Carolina  
April 3, 2013

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

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Civil Action No.: 2010-CP-32-3172  
APPELLATE CASE NO.: 2012-212705

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Martha D. Goodwyn,.....Respondent

v.

Shadowstone Media and Robert  
Pachaly,.....Appellants.

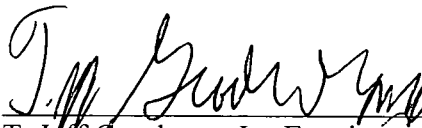
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**PROOF OF SERVICE**

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I certify that I have served the **Initial Brief of Respondent** and **Designation of Matter to be Included in the Record on Appeal** on Brian P. Robinson, Esquire, Counsel for the Appellants at the address below by depositing a copy of same in the United States Mail, postage prepaid, on April 3, 2013.

Brian P. Robinson, Esquire  
Bruner, Powell, Wall & Mullins, LLC  
P.O. Box 61110  
Columbia, SC 29260-1110

  
T. Jeff Goodwyn, Jr., Esquire  
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Attorney for Respondent

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April 3, 2013

# GOODWYN LAW FIRM, LLC

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April 3, 2013

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

RE: ***Martha D. Goodwyn v. Shadowstone Media, Inc. and Robert Pachaly***  
*Civil Action No.: 2010-CP-32-3172*  
*Appellate Case No.: 2012-212705*

Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the Initial Brief of Respondent and Designation of Matter to Be Included in the Record on Appeal, along with the Proof of Service, in regard to the above-referenced matter. Please return a clocked-in copy.

By copy of this letter and as evidenced by the attached Proof of Service, I am serving a copy of the Initial Brief and Designation of Matter on Brian P. Robinson, Esquire, counsel for the Appellants.

Please accept my highest regards.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb  
Enclosures  
cc: Brian P. Robinson, Esquire

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