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Nov 03 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Common Pleas

APPEAL FROM MCCORMICK COUNTY
Court of Common Pleas

The Honorable J. Cordell Maddox Jr., Circuit Judge
The Honorable Debra R. McCaslin, Circuit Judge

Case No. 2019-002018

R. Jay Lagroon,

Appellant,

v.

Crystal Suggs and Scott Suggs,

Respondents.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Respondents propose the following be included in the Record on Appeal:

1. Summons and Complaint;
2. Scott Suggs' Motion to Dismiss dated August 15, 2017;
3. Crystal Suggs' Motion to Dismiss dated August 16, 2017;
4. Amended Complaint;
5. Plaintiff's Motion to Amend;
6. Scott Suggs' Motion to Dismiss dated February 20, 2018;
7. Crystal Suggs' Motion to Dismiss dated February 21, 2018;
8. Answer of Scott Suggs;
9. Answer of Crystal Suggs;
10. Motion to Set Aside Order;
11. Defendants' Joint Motion to Compel Plaintiff's Discovery Responses and Attendance at a Deposition;
12. Lagroon's Motions to Compel;
13. Defendants' Joint Motion to Alter or Amend dated September 4, 2020;
14. Plaintiff's Motion to Alter or Amend dated September 16, 2020;
15. Motion for Complete and Correct Transcript;
16. Defendant Scott Suggs' Interrogatories and Requests to Produce to Plaintiff;

17. Defendant Crystal Suggs' Interrogatories and Requests to Produce to Plaintiff;
18. First Answers to Interrogatories of the Defendant Scott Suggs and First Production of Request to Produce of Defendant Scott Suggs;
19. Notice of Deposition of Plaintiff;
20. Form 4 dated November 6, 2017;
21. Order dated April 3, 2019;
22. Order Denying Plaintiff's Motion to Set Aside Order (dated November 18, 2019);
23. Form 4 dated August 26, 2020;
24. Order Denying Defendant's Joint Motion to Alter or Amend (dated September 11, 2020);
25. Form 4 dated September 17, 2020;
26. Order dated July 20, 2021;
27. Transcript from hearing on February 26, 2018;
28. Statement of Non-Appearance for the Deposition of Robert Jay Lagroon;
29. Notice of Appeal filed December 3, 2018;
30. Notice of Appeal filed October 19, 2020

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

For 

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Attorney for Respondent Scott Suggs

This 3rd day of November, 2021.

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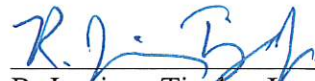
v.

Crystal Suggs and Scott Suggs,

Respondent.

Proof of Service

I certify that I have filed and served the Joint Initial Brief of Respondents and Designation of Matter on the below date by e-mailing a copy to the S.C. Court of Appeals at ctappfilings@sccourts.org and to R. Jay Lagroon at rlagroon63@aol.com and via mail at 791 S.C. Hwy 7, McCormick, SC 29835. This method of service and filing is based upon the Supreme Court's order dated August 25, 2021.



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Greenwood, South Carolina
November 3, 2021

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SC Court of Appeals

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November 3, 2021

S.C. Court of Appeals
Via e-mail: ctappfilings@sccourts.org

Re: R. Jay Lagroon v. Crystal Suggs and Scott Suggs – Joint Initial Brief of Respondents and Designation of Matter

Please find attached a copy of the Joint Initial Brief of Respondents and Designation of Matter in the above-referenced matter along with proof of service. I am serving appellant simultaneously via e-mail and U.S. mail.

Thank you for your assistance in this matter.

Yours truly,



R. Jamison Tinsley Jr.

cc: R. Jay Lagroon (via e-mail: rlagroon63@aol.com)
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