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**Nov 10 2021**

**SC Court of Appeals**

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

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Appeal from Charleston County  
Court of Common Pleas

The Honorable Bentley Price, Circuit Court Judge

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

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The Estate of Delila Parrott,

Respondent,

v.

Sandpiper Independent and Assisted Living-Delaware, LLC,

Appellant.

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**RESPONDENT'S DESIGNATION OF MATTERS  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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Pursuant to Rule 209, SCACR, Respondent designates the following items for inclusion in the Record on Appeal:

1. Complaint, filed October 11, 2016;
2. Amended Complaint, filed December 11, 2019;
3. Sandpiper Answer to Amended Complaint, filed December 26, 2019;
4. Consent Order, entered January 25, 2018;
5. Order filed October 16, 2020;

6. Sandpiper's post-trial motion for reconsideration, filed on October 26, 2020;
7. Order denying posttrial motions, filed November 18, 2020;
8. Def's NOA, served December 17, 2020;
9. Trial Transcripts, September 8 - 10, 2020 (3 volumes);
10. Trial Exhibits – Plaintiff's Exhibit 1; and
11. Deposition transcripts of video depositions of Lila Waters and Dr. Bergmann (as played at trial).

The undersigned certifies that this Designation contains no material which is irrelevant to the appeal.

REEVES AND LYLE, LLC

/s/ Paul L. Reeves

Paul L. Reeves (S.C. Bar # 4674)

Todd R. Lyle (SC # 102308)

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**ATTORNEYS FOR RESPONDENT**

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**PROOF OF SERVICE**

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REEVES AND LYLE, LLC

*/s/ Paul L. Reeves*

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**ATTORNEY FOR RESPONDENT**

I, Paul L. Reeves, of Reeves and Lyle, LLC, counsel for the Respondent above named, do hereby certify that I have served the **Initial Brief of Respondent and Respondent's Designation of Matters to be Included in the Record on Appeal** on the below-named Counsel for Appellant by electronic service addressed as follows:

Stephen L. Brown, Esquire  
D. Jay Davis, Jr., Esquire  
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REEVES AND LYLE, LLC

/s/ Paul L. Reeves  
Paul L. Reeves (S.C. Bar # 4671)  
Todd R. Lyle (SC # 102308)  
John G. Bowell, Of Counsel (SC Bar #778)  
*Attorneys for Respondent*

Columbia, South Carolina  
Dated: November 10, 2021

# Reeves & Lyle

ATTORNEYS AT LAW

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**SC Court of Appeals**

November 10, 2021

**VIA Upload**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: The Estate of Delilah Parrott vs. Sandpiper Independent and Assisted  
Living-Delaware, LLC  
Appellate Case No.: 2020-001643

Dear Ms. Kitchings:

Enclosed for filing is the Initial Brief of Respondent and Respondent's  
Designation of Matters to be Included in the Record on Appeal in connection with the  
referenced matter.

Thank you for your assistance. Please do not hesitate to contact me should you  
have any questions or require anything additional. I am,

Very truly yours,



Paul L. Reeves  
Attorney at Law

PLR:jrs

Cc: via electronic mail:

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