

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Nov 12 2021

SC Court of Appeals

APPEAL FROM SALUDA COUNTY
Court of Common Pleas

The Honorable Allison Renee Lee, Circuit Court Judge

C/A No. 2016-CP-41-00153
Appellate Case No. 2021-000659

CARR FARMS, INC. and TITAN FARMS, LLC.....Appellants,

v.

SUSANNAH SMITH WATSON, CARSON M. WATSON, and JUNE WATSON.....Respondents.

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

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

All matters designated by the Appellants, and in addition the following:

1. Second Amended Answer and Counterclaims of Susannah Smith Watson dated September 11, 2017;
2. Third Amended Answer and Counterclaims of Susannah Smith Watson dated October 2, 2017;
3. Deed of Distribution from the estate of Frances B. Smith a/k/a/ F. Broadus Smith dated January 6, 1995, recorded in Book 312 at Page 141; and

4. Foreclosure Special Referee Deed dated December 3, 2014, recorded on January 16, 2015
in Book 1064 at Page 77.

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

s/Daniel L. Draisen
Daniel L. Draisen
S.C. Bar No. 13536
The Injury Law Firm, P.C.
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(864) 888-8887
Attorneys for Respondents

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v.

**SUSANNAH SMITH WATSON, CARSON M. WATSON, and JUNE
WATSON.....Respondents.**

PROOF OF SERVICE

I certify that I have served copies of: a) *Initial Brief of Respondents*; and b) *Respondents' Designation of Matter to be Included in the Record on Appeal*, by depositing a copy of same in the United States Mail, postage pre-paid, on November 12, 2021, to Appellant's attorney of record, addressed to:

Jonathan M. Milling, Esq.
MILLING LAW FIRM, LLC
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Attorney for Appellants

s/Daniel L. Draisen
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November 12, 2021

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Carr Farms, Inc. and Titan Farms, LLC v. Susannah Smith Watson, et al.
Appellate Case No. 2021-000659

Dear Mrs. Kitchings:

Please find enclosed for filing the following:

- a.) Initial Brief of Respondents;
- b.) Respondents' Designation of Matter to be Included in the Record on Appeal; and
- c.) Proof of Service for same on counsel for the Appellants.

With kind regards,

THE INJURY LAW FIRM, PC

Daniel L. Draisen

DLD
Enclosures
cc: Jonathan M. Milling, Esq.



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