

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**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.

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

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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.  
2006 North Main Street  
Anderson, South Carolina 29621  
(864) 888-8887  
Attorneys for Respondents

November 12, 2021

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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  
2910 Devine Street  
Columbia, South Carolina 29205  
Attorney for Appellants

s/Daniel L. Draisen  
Daniel L. Draisen  
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DANIEL L. DRAISEN, ESQ.  
\*Licensed in SC and OK

November 12, 2021

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SC Court of Appeals

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

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

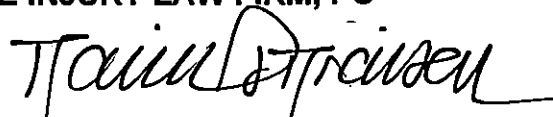
Dear Mrs. Kitchings:

Please find enclosed for filling 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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