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Mar 22 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS

The Honorable R. Markley Dennis, Jr., Circuit Court Judge

Appeal No.: 2021-001421
THE STATE OF SOUTH CAROLINA
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The Honorable R. Markley Dennis, Jr., Circuit Court Judge

Appeal No.: 2021-001421

TRECA DESHIELDS,.....Appellant,

v.

JHM ENTERPRISES, INC., D/B/A
MARRIOTT IN CHARLESTON
COUNTY, S.C.,.....Respondent.

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

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

1. Complaint, filed August 17, 2019;
2. Defendant’s Answer to Plaintiff’s Complaint, filed Nov. 13, 2019;
3. Defendant’s Motion for Summary Judgment, filed August 6, 2020;
4. Defendant’s Memorandum in Support of its Motion for Summary Judgment, filed

- Oct. 7, 2020, including Exhibits A-E;
5. Plaintiff's Return and Memorandum in Response to Defendant's Motion for Summary Judgment, dated December 11, 2020, including Exhibits 1-11;
 6. Form 4 Order, filed Feb. 10, 2021;
 7. Order Granting Defendant's Motion for Summary Judgment, filed June 16, 2021;
 8. Motion to Reconsider, Alter or Amend, filed June. 17, 2021; and,
 9. Order Denying Plaintiff's Motion to Reconsider Alter or Amend, filed Nov. 23, 2021.

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

March 22, 2022

McANGUS GOUDELOCK & COURIE LLC

s/Helen F. Hiser

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*Attorneys for Respondent JHM Enterprises, Inc.,
d/b/a Marriott in Charleston County, S.C.*

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v.

JHM ENTERPRISES, INC., D/B/A
MARRIOTT IN CHARLESTON
COUNTY, S.C.,.....Respondent.

PROOF OF SERVICE

I certify that on the 22nd day of March 2022, I served the **Initial Brief of Respondent JHM Enterprises, Inc. d/b/a Marriott in Charleston County, S.C.**, and Respondent’s **Designation of Matter to be Included in the Record on Appeal** on Treca DeShields by emailing a copy of each to her counsel of record as follows:

Jon E. Newlon, Esq.
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s/Helen F. Hiser

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*Attorneys for Respondent JHM Enterprises, Inc.
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Reply To

HELEN F. HISER
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March 22, 2022

Via S.C. Courts E-Filing

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

RE: Treca DeShields v. JHM Enterprises, Inc., d/b/a Marriott in Charleston
County, S.C.
Civil Action No.: 2019CP1004310 (Charleston)
Date of Incident: December 1, 2017
Carrier Claim No.: 0001863978
MGC File No.: 20465.19142
Appeal No.: 2021-001421

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

1. the Initial Brief of Respondent JHM Enterprises, Inc., d/b/a Marriott in Charleston County, S.C.;
2. Respondent's Designation of Matter to be Included in the Record on Appeal; and
3. Respondent's Proof of Service concerning items one and two.

Please do not hesitate to contact me if you have any questions.

Yours truly,

McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Jon E. Newlon, Esquire (via email only)