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**Apr 12 2022**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA**  
In The Court Of Appeals

**APPEAL FROM GREENVILLE COUNTY**  
Court of Common Pleas

The Hon. Perry H. Gravely, Circuit Court Judge

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Common Pleas Case No. 2019-CP-23-02032  
Appellate Case No. 2021-001177

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Julia Sibley-Jones, as Personal Representative of the  
Estate of William A.L. Sibley, Jr., ..... Respondent-Appellant,

v.

Decide4action, Inc., ..... Appellant-Respondent.

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**RESPONSE DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL OF RESPONDENT-APPELLANT  
JULIA SIBLEY-JONES, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF  
WILLIAM A.L. SIBLEY, JR.**

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James E. Cox, Jr. (S.C. Bar No. 103886)  
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Attorneys for Respondent-Appellant Julia Sibley-Jones, as  
Personal Representative of the Estate of William A.L.  
Sibley, Jr.

Respondent-Appellant proposes that the following be included in the Record on Appeal:

1. Summons and Complaint, 4/11/2019
2. Answer to Complaint and Counterclaims, 5/22/2019
3. Amended Complaint, 12/28/2020
4. Sibley-Jones's Motion to Compel with Exhibits A-B
5. Consent Order Compelling Discovery, 1/8/2021
6. Answer to Amended Complaint and Counterclaims, 1/25/2021
7. Reply to Amended Counterclaims, 2/1/2021
8. Defendants' [sic] Proposed Witness List
9. Decide4Action's Motion[s] in Limine
10. Plaintiff's Motion in Limine to Exclude Evidence Regarding Any Damages Claimed by Defendant with Exhibits A-C
11. Plaintiff's Motion in Limine to Exclude Defendant's Undisclosed and Inadmissible Expert Opinions
12. Plaintiff's Motion for Directed Verdict
13. Defendant's Motion to Reconsider with Exhibits A-C
14. Trial Transcript
  - p. 25, 1.11-p. 27, 1.8
  - p. 72, 1.5-p. 100, 1.14
  - p.101, 1.12-p. 122, 1.13
  - p. 131, 1.2-p. 159, 1.25
  - p.160. 1.1-p. 161, 1.17
  - p.162, 1.3-p. 168, 1.4
  - p.170, 1.21-p.182, 1.20
  - p.186, 1.4-p. 204, 1.3
  - p.205, 1.13-p. 220, 1.10
  - p. 284, 1.6-p. 285, 1.2
  - p. 320, 1.20-p. 336, 1.21
  - p. 344, 1.13-p. 387, 1.2
15. Court Trial Exhibit 2 (Bergeron Deposition, pages 71-88)
16. Plaintiff's Trial Exhibit 1 (3/10/2017 Letter of Intent)
17. Plaintiff's Trial Exhibit 2 (4/2017 Employee Compensation Chart)
18. Plaintiff's Trial Exhibit 3 (6/22/2017 Letter from Dan Carlton, CPA to Richard Bergeron)
19. Plaintiff's Trial Exhibit 5 (P&L Statement, July 2017)
20. Plaintiff's Trial Exhibit 6 (P&L Statement, June 2017)
21. Plaintiff's Trial Exhibit 7 (CC+I 2016 Tax Return)
22. Plaintiff's Trial Exhibit 8 (10/13/2017 Stock Purchase Agreement)
23. Plaintiff's Trial Exhibit 9 (10/16/2017 Indemnity Escrow Agreement)
24. Plaintiff's Trial Exhibit 10 (9/19/2018 Letter to UCB from Defendant's Counsel)
25. Plaintiff's Trial Exhibit 11 (10/30/2018 Letter to UCB from Plaintiff's Counsel)
26. Plaintiff's Trial Exhibit 12 (12/13/2018 Letter to Plaintiff's Counsel from Defendant's Counsel)

27. Plaintiff's Trial Exhibit 16 (Agreement Regarding Application of Funds)
28. Plaintiff's Trial Exhibit 17 (10/16/2017 Contribution and Indemnification Agreement)
29. Plaintiff's Trial Exhibit 18 (8/12/2020 Probate Court Appointment)
30. Plaintiff's Trial Exhibit 19 (10/30/2020 Decide4Action Responses to Sibley-Jones's Requests for Admission)
31. Plaintiff's Trial Exhibit 20 (7/20/2021 Appointment of Selling Parties Representative)
32. Plaintiff's Trial Exhibit 21 (7/16/2021 UCB Escrow Account Balance Statement)
33. Form 4 Order and Judgment, 7/28/2021
34. Final Order and Judgment regarding Escrow Fund, 8/6/2021

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

Respectfully submitted,

WYCHE, P.A.

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April 12, 2022

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PROOF OF SERVICE

I, Gregory J. English, of Wyche, P.A., attorneys for the Respondent/Appellant in the within action, do hereby certify that I have this date served upon opposing counsel the foregoing **RESPONSE DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL OF RESPONDENT-APPELLANT JULIA SIBLEY-JONES, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF WILLIAM A.L. SIBLEY, JR.** by email and first class mail, addressed to the following:

<p>Kimberly Thomason Devon Puriefey Truluck Thomason, LLC 3 Boyce Avenue Greenville, SC 29601 <a href="mailto:kim@truluckthomason.com">kim@truluckthomason.com</a> <a href="mailto:devon@truluckthomason.com">devon@truluckthomason.com</a></p>	<p>Howard W. Anderson III Law Office of Howard W. Anderson, III, LLC P.O. Box 661 Pendleton, SC 29670 <a href="mailto:howard@hwalawfirm.com">howard@hwalawfirm.com</a></p>
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