

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

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

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APR 26 2022

SC Court of Appeals

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

v.

Decide4Action, Inc., Appellant-Respondent.

**REPLY 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.**

Gregory J. English (S.C. Bar No. 65470)
James E. Cox, Jr. (S.C. Bar No. 103886)
WYCHE, P.A.

200 East Broad St., Suite 400
Greenville, South Carolina 29601
Post Office Box 728
Greenville, South Carolina 29602
(864) 242-8200

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. Amended Complaint, 12/28/2020
2. Plaintiff's Trial Exhibit 9 (10/16/2017 Indemnity Escrow Agreement)
3. Plaintiff's Trial Exhibit 10 (9/19/2018 Letter to UCB from Defendant's Counsel)
4. Plaintiff's Trial Exhibit 11 (10/30/2018 Letter to UCB from Plaintiff's Counsel)
5. Plaintiff's Trial Exhibit 12 (12/13/2018 Letter to Plaintiff's Counsel from Defendant's Counsel)
6. Plaintiff's Trial Exhibit 16 (Agreement Regarding Application of Funds)
7. Trial Transcript
 - p. 148, l.8-12
 - p. 163, l.6-p. 167, l.7
 - p. 384, l.17-19
 - p. 385, l.20-24
8. Form 4 Order and Judgment, 7/28/2021
9. Plaintiff's Motion to Alter and Amend Judgment to Include Accrued Interest, Prejudgment Interest, and Costs, 8/9/2021
10. Plaintiff's Reply in Support of Motion to Alter and Amend Judgment, 9/21/2021
11. Affidavit regarding Costs in Support of Motion to Alter and Amend Judgment, 9/21/2021
12. Order Denying Plaintiff's Motion to Alter or Amend, 10/13/2021

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

Respectfully submitted,

WYCHE, P.A.

BY: s/ Gregory J. English
Gregory J. English (S.C. Bar No. 65470)
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.

April 22, 2022

Other Counsel of Record:

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v.

Decide4action, Inc., Appellant-Respondent.

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 **REPLY 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:

Kimberly Thomason Devon Puriefoy Truluck Thomason, LLC 3 Boyce Avenue Greenville, SC 29601 kim@truluckthomason.com devon@truluckthomason.com	Howard W. Anderson III Law Office of Howard W. Anderson, III, LLC P.O. Box 661 Pendleton, SC 29670 howard@hwalawfirm.com
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s/ Gregory J. English _____

Gregory J. English

James E. Cox, Jr.

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

April 22, 2022

Stacey H. Wascom

From: Stacey H. Wascom
Sent: Friday, April 22, 2022 3:23 PM
To: 'kim@truluckthomason.com'; 'devon@truluckthomason.com';
'howard@hwalawfirm.com'
Cc: Greg English; jcox@wyche.com
Subject: Julia Sibley-Jones v. Decide4Action - Appellate Case No.: 2021-001177
Attachments: Reply Brief on cross-appeal (Sibley v. Decide4action).pdf; Plaintiff's Reply Designation of Matter on Cross-Appeal (Sibley v. Decide4action).pdf

Dear Counsel:

Please find attached and served upon you, Initial Reply Brief on Cross-Appeal of Respondent- Appellant as well as the Reply Designation of Matter to be Included in the Record on Appel of Respondent-Appellant.

Best regards,



Stacey Wascom | Wyche

Litigation Paralegal

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A Lex Mundi Member Firm

W Y C H E

Attorneys at Law

April 22, 2022

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SC Court of Appeals

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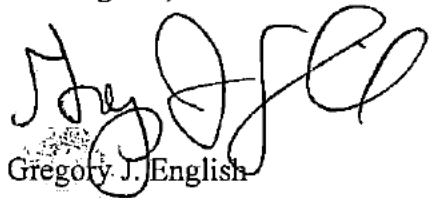
Hon. Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

Re: Sibley v. Decide4action, Inc., Case No. 2019-CP-23-02032

Dear Ms. Kitchings:

Enclosed please find the Reply Brief on Cross-Appeal of Respondent-Appellant Julia Sibley-Jones, as Personal Representative of the Estate of William A.L. Sibley, Jr. and Reply Designation of Matter to be Included in the Record on Appeal along with Proof of Service of Same.

Best regards,



Gregory J. English

(864) 242-8247
genglish@wyche.com

GJE/shw

Enclosures

cc: Kimberly T. Thomason, Esq. (by mail)
Devon M. Puriefoy, Esq. (by mail)
Howard W. Anderson, III, Esq. (by mail)

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Attorneys at Law

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APR 24 2022

SC Court of Appeals

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