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May 19 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM AIKEN COUNTY
COURT OF COMMON PLEAS

M. Anderson Griffith, Master in Equity

Case No. 2020-CP-02-1173

Mark B. Mitchell and Celine C. Mitchell, Plaintiffs,

v.

Ronald Joseph Albertelli and Mary Frances Snelling, Trustees of the Mary Frances Snelling Living Trust, Donnita C. Harmon and Jimmie Phillip Harmon, Defendants,

Of whom Mark B. Mitchell, Celine C. Mitchell, Ronald Joseph Albertelli, and Mary Frances Snelling are the Respondents,

And

Donnita Harmon and Jimmy Harmon are the Appellants.

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL
BY RESPONDENTS MITCHELL

Respondents Mitchell propose the following be included in the Record on Appeal:

1. Complaint;
2. Answer and Counterclaim of Appellants;
3. Answer of Respondents Albertelli and Snelling;
4. Reply of Respondents Mitchell;
4. Deposition Transcript of Donnita Harmon pp. 14 – 15; 27 – 29, 47 – 57; and 75;
5. Transcript of Proceedings pp. 6 – 15; 39 – 40; 45 - 47; 59 – 67; and 78 – 83;
5. Plaintiffs' Exhibit 1;
6. Joint Exhibits 1, 2, 3, 4, 5;
7. Order for Reference to Master-In-Equity of June 30, 2021;
8. Order of the Master-In-Equity of February 9, 2022.

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

Date: May 19, 2022

s/W. Grady Jordan
W. Grady Jordan (S.C. Bar #66104)
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Of whom Mark B. Mitchell, Celine C. Mitchell, Ronald Joseph Albertelli, and Mary Frances Snelling are the Respondents,

And

Donnita Harmon and Jimmy Harmon are the Appellants.

PROOF OF SERVICE

I certify that I have served the Respondents Mitchell's Initial Brief and Respondent Mitchell's Designation of Matter on the counsels addressed below, by emailing a PDF of same, on May 19, 2022, addressed to the counsels of record at the following email addresses:

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May 19, 2022

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

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SC Court of Appeals

**RE: Mark Mitchell, Celine Mitchell, Ronald Albertelli and Mary Frances Snelling
v. Donnita Harmon and Jimmie Philip Harmon**

**Honorable M. Anderson Griffith, Master in Equity
Case No.: 2020-CP-02-1173**

Dear Ms. Kitchings:

Attached for filing with regard to the above-referenced matter please find the following:

- Respondents Mitchell's Initial Brief;
- Respondents Mitchell's Designation of Matter;
- Proof of Service regarding same.

By copy of this correspondence, I am serving the Respondents' Brief and Respondents' Designation of Matter upon counsel for Appellants and Respondents Albertelli and Snelling.

Sincerely,

W. Grady Jordan

W. Grady Jordan
Attorney for Respondents Mitchell

WGL/amr

cc: John W. Harte, Esq. john@jwhartelaw.com
Brad A. Brodie, Esq. brodielawfirm@gmail.com

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