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Jun 17 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
Bentley Price, Circuit Court Judge

Case No. 2021-CP-08-00513
Appellate Tracking No.: 2021-00768

Aracelis Santos,Appellant,
vs.

Harris Investment Holdings, L.L.C.
the City of Hanahan, John Doe #1 and
John Doe #2Defendants,

of whom

Harris Investment Holdings, L.L.C. isRespondent.

DESIGNATION OF CONTENTS OF RECORD ON APPEAL

Thomas R. Goldstein, S. C. Bar #2186
Belk, Cobb, Infinger & Goldstein, P.A.
P. O. Box 71121
N. Charleston, South Carolina 29415-1121
(843) 554-4291 (843) 554-5566 (fax)
E-mail: tgoldstein@cobblaw.net
ATTORNEYS FOR APPELLANT

ORDERS

Here print the Form Order Dismissing Complaint June 14, 2021
Here print the “Order” Denying Reconsideration filed June 29, 2021
Here print the Form Order “Decline to Sign” [Docket Sheet] July 6, 2021
Here print the Appeal Bond Order May 17, 2018
Here print Order for Ejectment December 7, 2017 (Respondent’s Designation)
Here print Order for Attorney’s fees February 9, 2018 (Respondent’s Designation)
Here print Orders Dismissing Appeal June 6, 2019 (Respondent’s Designation)
Here print Order affirming Magistrate Court June 6, 2019 (Respondent’s Designation)
Here print Form 4 Order June 14, 2021 to Dismiss (Respondent’s Designation)

PLEADINGS

Here print the Complaint March 2, 2021
Here print Harris Investment Holdings, L.L.C. Motion to Dismiss April 2, 2021
Here print the City of Hanahan Motion to Dismiss May 7, 2021
Motion for Reconsideration and supporting memorandum June 15, 2021
Notice of Appeal July 14, 2021
Clerk of Court’s Docket Sheet

MEMORANDUM AND EXHIBITS

Here print Harris Investment Holdings, L.L.C. memorandum May 25, 2021
Here print Santos’ memorandum and exhibit 1, application for injunction and supporting affidavit May 27, 2021
Here print June 28, 2021, correspondence to Court objecting to proposed Order

TRANSCRIPT OF RECORD

Here print the transcript of record June 3, 2021

OTHER CASES

Here print application for ejectment November 14, 2016 (Respondent’s Designation)

Here print Appellant's Application for T.R.O. and supporting affidavit March 19, 2019
Here print March 30, 2017, amended complaint in 2017-CP-08-177, *Santos and Reyna v. City of Hanahan*
Here print March 30, 2022, complaint in 2022-CP-08-0767, *Tri-Bay Construction, L.L.C. v. Harris Investment Holdings, L.L.C.*
Here print March 31, 2022, complaint in 2022-CP-08-0775, *Harris Investment Holdings, L.L.C. v. ADC Engineering, Inc., et. al.*
Lease dated December 15, 2015 (Respondent's designation)
Correspondence October 16, 2018 (Respondent's designation)
Correspondence February 26, 2019 (Respondent's designation)

CERTIFICATION

I certify that that Appellant's original Designation included no irrelevant material; however, Respondent designated irrelevant, repetitive material, which is already included in the Record on Appeal in the companion case 2019-001169. Respondent's designation requires Appellant to designate additional documents that would otherwise be irrelevant. (civil rights complaints at 2017-CP-08-177 and recent Harris Investment Holdings' litigation at Case Numbers 2022-CP-08-0767 and 0775.

June 17, 2022

/s/ Thomas R. Goldstein
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and John Doe #2Defendants,

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PROOF OF SERVICE

I certify that I have served the Appellant’s Initial Reply Brief, Designation of Contents of Record on Appeal on the Respondent, Harris Investment Holdings, L.L.C., by depositing a copy of it in the United States Mail, postage prepaid, on June 16, 2022, addressed to the attorneys of record, Merritt Abney, 151 Meeting Street, Sixth Floor, Charleston, S. C. 29401-2239. (I also sent a copy to counsel for the City of Hanahan and John Doe #1 and John Doe #2, Stafford J. McQuillin at P. O. Box 340, Charleston, S. C. 29402.)

June 17, 2022

/s/Thomas R. Goldstein
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