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Nov 11 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No.: 2018-CP-10-4083

Appellate Case No.: 2022-001114

Charleston Carriage Works, L.L.C.,

Appellant,

v.

Charleston Animal Society, Ellen Harley and
Charleston Carriage Horse Advocates, Inc.,

Respondents.

DESIGNATION OF CONTENTS OF RECORD ON APPEAL

November 11, 2022

/s/Thomas R. Goldstein

Thomas R. Goldstein, S. C. Bar No. 2186
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Attorneys for Appellant

ORDERS

August 2, 2022	Order denying motions for reconsideration
May 12, 2022	Order denying amendments to add parties defendant and plaintiff
May 12, 2022	Order denying amended scheduling Order
May 12, 2022	Order granting summary judgment
May 5, 2022	Order denying sanctions for failure to provide discovery
July 8, 2021	Order referring motions to Master-in-Equity (reference fee omitted)
May 27, 2021	Order referring case to Master-in-Equity
July 30, 2020	Order Resolving Cross Motions to Compel
July 16, 2019	Consent Scheduling Order
June 17, 2020	Plaintiff's Motion to Compel is Granted
June 2, 2020	Confidentiality Order

PLEADINGS

August 17, 2018	Amended Complaint
October 19, 2018	Motions to Dismiss
October 19, 2018	Motions for Summary Judgment
July 5, 2019	Plaintiffs Motion to Compel
July 22, 2019	Defendant's Motion to Compel
September 27, 2019	Plaintiff's Amended Motion to Compel
November 20, 2019	Motions for Summary Judgment (2)
November 20, 2019	Answers (3)
November 20 2019	Motion to Limit Liability and Strike Claim
January 30, 2020	Motion for Confidentiality
January 30, 2020	Motion to Quash Subpoena
January 30, 2020	Motion to Compel Plaintiff's Responses
April 6, 2020	Motion to Amend Complaint
May 27, 2020	Motion for Summary Judgment
August 17, 2020	Motion to Compel Plaintiff's discovery responses
August 19, 2020 Motion	Motion to Quash Subpoena
September 11, 2020	Motion for summary judgment
October 2, 2020	Motion for Sanctions
October 20, 2020	Motion to Enlarge Time and extend scheduling Order
November 16, 2020	Motion for summary judgment
May 12, 2022	Motion for Reconsideration
May 20, 2022	Motion for Reconsideration
August 11, 2022	Notice of Appeal

AFFIDAVITS

February 25, 2020	Affidavit of Broderick Christoff
December 2, 2020	Supplemental Affidavit of Broderick Christoff

August 19, 2021	Second Supplemental Affidavit of Broderick Christoff
September 24, 2021	Third Supplemental Affidavit of Broderick Christoff
April 22, 2022	Fourth Supplemental Affidavit of Broderick Christoff
September 11, 2020	Affidavit of Joe Elmore
September 28, 2021	Affidavit of Katherine Vaughn
April 22, 2022	Affidavit of Steve Abrams
August 20, 2021	Affidavit of Ellen Harley

MEMORANDA and EXHIBITS

February 18, 2020	Memo in opposition to motion to limit damages
February 25, 2020	Memo in opposition to motion for summary judgment
May 1, 2020	Joint memo in opposition to motion to amend
May 22, 2020	Memo in opposition to plaintiff's motion to compel
May 26, 2020	Memo in support of motion to amend
October 2, 2020	Memo in support of motion for sanctions
December 2, 2020	Memo in support of status conference
August 19, 2021	Memo in opposition to summary judgment
August 20, 2021	Memo in support of summary judgment
August 20, 2021	Memo in opposition for amended scheduling order
August 20, 2021	Memo in opposition to application for sanctions
August 20, 2021	Memo in support of summary judgment
September 29, 2021	Memo in opposition to application to amend complaint
January 26, 2022	Supplemental Memorandum of Law
May 12, 2022	Memorandum in support of reconsideration
May 20, 2022	Memorandum in support of reconsideration
May 23, 2022	Notice of filing corrected exhibits

TRANSCRIPTS

	Transcript of Master in Equity September 29, 2021
December 15, 2020	Transcript of Judge Price May 28, 2020
June 7, 2022	Transcript of Judge Price June 16, 2020
August 20, 2021	Transcript of 30(b)(6) deposition
May 5, 2022	Transcript of Justin Miller, D.V.M.

VIDEO

Video of incident—filed electronically only

ORDINANCES

Article V of Section 29 of City Code

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Certificate of Counsel

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

November 11, 2022

/s/ Thomas R. Goldstein

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PROOF OF SERVICE

I certify that I have served the Initial Brief, Designation of Contents of Record on Appeal, and Motion to Exceed Page Limits upon the Charleston Animal Society, Charleston Carriage Horse Advocates and Ellen Harley by depositing a copy of it in the United States Mail (and by providing an electronic copy), postage prepaid on August 11, 2022, addressed to their attorneys of record, Elizabeth Palmer at her office Saxton & Stump at 151 Meeting Street, Suite 350, Charleston, South Carolina 29401 and to Joseph Thompson at his office Hall Booth Smith, P.C. at 111 Coleman Boulevard, Mt. Pleasant, S. C. 29464, and to Jenkins Mann at his office, Mann Blake & Jackson at 1901 Main Street, Suite 1205, Columbia, South Carolina 29201.

November 11, 2022

/s/Thomas R. Goldstein

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Hon. Jenny A. Kitchings
Clerk of Court
S. C. Court of Appeals
P. O. Box 11629
Columbia, S. C. 29211

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RE: Tracking No. 2022-001114
Charleston Carriage Works, LLC v. Charleston Animal Society, et. al.

Dear Ms. Kitchings,

I enclose the Appellant's Motion for Leave to exceed page limitations on Appellant's Brief along with a certificate of service and our firm's check in the amount of \$50.00 to cover this request. Please let me know if you need anything further to process this motion. I thank you in advance for your attention to this request. With kind regards I am

Very truly yours,

Belk, Cobb, Infinger & Goldstein, P.A.
Thomas R. Goldstein

enclosure: Motion for Extension, check No. 20145

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