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May 25 2023

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.

JOINT DESIGNATION OF CONTENTS OF RECORD ON APPEAL

May 25, 2023

/s/Thomas R. Goldstein

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ORDERS

August 2, 2022	Order denying motions for reconsideration	1
May 12, 2022	Order granting summary judgment	4
May 12, 2022	Order denying amended scheduling Order	40
May 12, 2022	Order denying amendments to add parties	42
May 5, 2022	Order denying sanctions for failure to provide discovery	
July 8, 2021	Order referring motions to Master-in-Equity	
May 27, 2021	Order referring case to Master-in-Equity	
July 30, 2020	Order Resolving Cross Motions to Compel	
June 17, 2020	Order granting motion to compel	
June 2, 2020	Confidentiality Order	
July 16, 2019	Consent Scheduling Order	

PLEADINGS

August 17, 2018	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 Charleston Animal Society'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, CCHA's, to Compel Plaintiff's Responses	
April 6, 2020	Motion to Amend Complaint	
May 27, 2020	Motion, Charleston Animal Society, for Summary Judgment [Include and insert Vol. II, page 79 Christoff deposition]	
August 17, 2020	Motion to Compel Plaintiff's discovery responses	
August 19, 2020	Motion to Quash Subpoena	
September 11, 2020	Motion for summary judgment	
October 2, 2020	Motion for Sanctions	

October 6, 2020	Proof of ADR
October 20, 2020	Motion to Enlarge Time and extend scheduling Order
November 16, 2020	Motion for summary judgment
January 26, 2022	Memorandum Opposing Summary Judgment
April 6, 2022	Mediation at Impasse
May 12, 2022	Motion for Reconsideration
May 20, 2022	Motion for Reconsideration
May 23, 2022	Notice of filing corrected exhibit
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 (<i>Erickson</i> factors)
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

Dec. 7, 2018	Transcript of Broderick Christoff (attached to memorandum in support of summary judgement, including March 28, 2019)
May 3, 2019	Transcript of Elizabeth Fort
October 13, 2019	Transcript of Tara Little, D.V.M.
December 18, 2019	Transcript of Dan Riccio Vol. I
March 11, 2020	Transcript of Dan Riccio Vol. II
December 15, 2020	Transcript of Judge Price hearing on May 28, 2020
August 20, 2021	Transcript of 30(b)(6) deposition
September 29, 2021	Transcript of Master in Equity
May 5, 2022	Transcript of Justin Miller, D.V.M.
June 7, 2022	Transcript of Judge Price hearing on June 16, 2020
August 20, 2021	Transcript of 30(b)(6) deposition (Ellen Harley)

VIDEO

Video of incident—filed electronically only

ORDINANCES

Article V of Section 29 of City Code

MISCELLANEOUS

E-mail June 16, 2020

E-mails October 6 and October 26, 2020

Correspondence December 11, 2020 (Bank statements)

Notice of Removal

Motion for Remand and Notice of Dismissal

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Certificate of Counsel

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

May 25, 2023

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