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**Jan 16 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

Case No. 20-CP-22-00930  
Case No. 20-CP-22-00931  
Case No. 20-CP-22-00932  
Appellate Case No. 2023-001272

Sunset Lodge, LLC, .....Appellant,

v.

Town of Pawleys Island, .....Respondent,

and

Franklin D. Beattie, as trustee of the Franklin D. Beattie  
Preservation Trust, .....Appellant,

v.

Town of Pawleys Island, .....Respondent,

and

M. Baron Stanton, .....Appellant,

v.

Town of Pawleys Island, .....Respondent.

RESPONDENT’S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent Town of Pawleys Island proposes the following to be included in the Record on Appeal (as to each identical filing from all three consolidated actions):

1. Order of Dismissal (April 22, 2021)
2. Form 4 Order Denying Motion to Reconsider Dismissal (June 3, 2021)
3. Form 4 Order Denying Town Motion to Correct Clerical Error (July 12, 2022)

4. Order Granting Attorney Fees and Costs (June 8, 2023)
5. Form 4 Order Denying Motion to Reconsider Fee Award (June 28, 2023)
6. Complaint (November 12, 2020)
7. Answer (December 14, 2020)
8. Amended Complaint (January 13, 2021)
9. Notice of Abandonment of Condemnation Action (February 10, 2021)
10. Answer to Amended Complaint, with Exhibit (March 3, 2021)
11. Hearing Transcript – Fee Petition (April 14, 2023)
12. Motion for Protection from Discovery, with Exhibit(s) (March 3, 2021)
13. Motion to Dismiss (March 5, 2021)
14. Memorandum in Opposition to Motion to Dismiss (March 31, 2021)
15. Motion to Reconsider Dismissal (April 28, 2021)
16. Town Motion to Correct Clerical Error (June 14, 2021)
17. Notice of Appeal (Order of Dismissal) (July 2, 2021)
18. Plaintiff Motion to Correct Clerical Error (July 22, 2022)
19. Stipulation re: Clerical Error (September 7, 2022)
20. Motion for Attorney Fees (October 21, 2022)
21. Affidavit of M. Baron Stanton, with Exhibits (October 21, 2022)
22. Affidavit of N. David Durant, Sr., with Exhibit (A) (December 12, 2022)
23. Affidavit of William C. Dillard, Jr., with Exhibits (A – F) (December 12, 2022)
24. Memorandum in Opposition to Fee Petition (December 13, 2022)
25. Reply in Support of Fee Petition, with Exhibits (A – C) (March 8, 2023)
26. Amended Affidavit of M. Baron Stanton (March 8, 2023)
27. Second Amended Affidavit of M. Baron Stanton (June 8, 2023)
28. Motion to Reconsider Fee Award (June 20, 2023)
29. Amended Motion to Reconsider Fee Award (June 20, 2023)
30. Second Amended Motion to Reconsider Fee Award (June 20, 2023)
31. Notice of Appeal (Fee Award) (July 28, 2023)
32. Satisfaction of Judgment (all three to be included) (August 29, 2023)

Except where otherwise indicated, all designations are with all exhibits but do not include certificates of service.

Respondent stipulates, upon appropriate order of the Court, to inclusion in the Record of only a single representative copy where identical documents (other than distinct captions) were filed or entered in each of the three consolidated actions.

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

Respectfully submitted,

s/ William C. Dillard, Jr.  
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ATTORNEYS FOR RESPONDENT  
TOWN OF PAWLEYS ISLAND

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