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Jul 11 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 B. Alex Hyman

Case No. 2020-CP-22-00356
Appellate Case No. 2023-001454

Ron Christmas,
Appellant,

v.

County of Georgetown, City of Georgetown, and South Carolina Department of Transportation,
Respondents.

**DESIGNATION OF MATTERS
TO BE INCLUDED IN THE RECORD OF APPEAL**

Appellant Ron Christmas proposes the following be included in the Record on Appeal:

Orders, Judgments, and Decisions

1. Order Denying City's Motion to Dismiss (Stormwater Statute Claim) filed March 22, 2022
2. Amended Order Denying City's Motion to Dismiss filed June 7, 2022
3. Form 4 (Directed Verdict) filed August 17, 2023

Pleadings and Related Matters

4. Complaint filed April 3, 2020
5. Amended Complaint filed November 11, 2021
6. Second Amended Complaint filed November 30, 2022
7. Plaintiff's Pretrial Brief filed August 11, 2023

8. Plaintiff's Opposition to City's Motion for Summary Judgment filed August 14, 2023
9. Plaintiff's proposed jury charges

Exhibits

Appellant's Exhibits:

10. Exh. 1: East Bay Park Lease
11. Exh. 21: SCODT Permit Encroachment
12. Exh. 38: Topographic Report
13. Exh. 40: Robert Castles' Report
14. Exh. 41: Sea Level Rise
15. Exh. 43: Survey
16. Exh. 47: Photos of Tide
17. Exh. 48: Photos taken by Appellant
18. Exh. 49: City Map
19. Exh. 141: Final Construction Plans
20. Exh. 155: Photo of cracking
21. Exh. 163: Comparison of road plane
22. Exh. 166: Tide Char
23. Exh. 176: Six photos from Geiger Report

Respondents' Exhibits:

24. Exh. 1: City Map
25. Exh. 2: Soil Survey Map
26. Exh. 4: Building Permit

Transcripts

27. August 14 – 17, 2023, Amended Trial Transcript pp. 5-19, 146-174, 182-700

JUSTIN O'TOOLE LUCEY, P.A.

/s/Justin Lucey

Justin O'Toole Lucey (SC Bar No.: 15438)

Joshua F. Evans (SC Bar No.: 77448)

Sohayla R. Townes (SC Bar No.: 102814)

415 Mill Street

Mount Pleasant, SC 29464

Telephone: (843) 849-8400

Attorneys for Appellant

Charleston, South Carolina

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PROOF OF SERVICE

I, the undersigned, attorney for Appellant Ron Christmas, do hereby certify that I have this date served the foregoing **DESIGNATIONS OF MATTER** by personally serving the same upon the following counsel using the primary email addresses as listed via the Attorney Information System on July 11, 2024.

Counsel of Record

M. Kirk Battle, Esq.

Michael W. Battle, Esq.

Battle Law Firm, LLC

P.O. Box 530

Conway, SC 29528

kbattle@battlelawsc.com

mbattle@battlelawsc.com

Attorneys for County of Georgetown

Andrew F. Lindemann, Esq.
Lindemann Law Firm, P.A.
P.O. Box 6923
Columbia, SC 29260
andrew@ldlawsc.com
Attorney for City of Georgetown

Lisa A. Thomas, Esq.
Carmen V. Ganjehsani, Esq.
Richardson Plowden
Office: 2103 Farlow Street
Myrtle Beach, SC 29577
Mailing Address: P.O. Box 3646
Myrtle Beach, SC 29578
lthomas@richardsonplowden.com
cganjehsani@richardsonplowden.com
Attorneys for South Carolina Department of Transportation

JUSTIN O'TOOLE LUCEY, P.A.

s/Justin Lucey

Justin O'Toole Lucey (S.C. Bar No. 15438)

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