

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2024-000961

Ryan McAvoy, Appellant,

v.

The Town of Hilton Head Island, South Carolina, Respondent.

**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Appellant proposes the following to be included in the Record on Appeal:

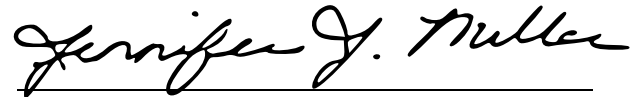
1. Order of May 8, 2024
2. Complaint;
3. Answer;
4. Transcript of Proceedings, pp. 39, 72-74, 76, 94-96, 111, 112, 119-122, 128-139,
5. Plaintiffs Exhibit 1, Town Clerk Christa Weidemeyer Affidavit and Attachments including Certified Town of Hilton Head Island Resolution No. 2022-11, signed May 3, 2022, and Attached Contract between Town and SIDA
6. Plaintiffs Exhibit 10, Letter of John F. Brinkley, President of SIDA to the Town confirming public funds assistance
7. Plaintiffs Exhibits 12-17
8. Plaintiffs Exhibit 18, Exhibit B to Affidavit of SIDA President John F. Brindley Affidavit and its Attachments

Appendix

South Carolina Public Interest Foundation v. South Carolina Department of Transportation, Case Number 2013-CP-40-03677, Order entered January 29, 2018) (“The Driveway Case”). Driveway case

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

September 12, 2024

A handwritten signature in black ink that reads "Jennifer J. Miller". The signature is written in a cursive style and is positioned above a horizontal line.

Jennifer J. Miller S.C. Bar No. 13116

819 East North Street, Suite 230

Greenville, SC 29601

Telephone: (864) 235-1269

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Attorney for Appellant

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SC Court of Appeals

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Appellate Case No. 2024-000961

Ryan McAvoy, Appellant,

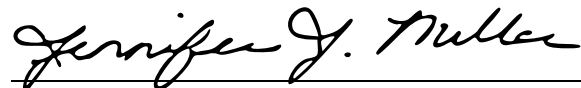
v.

The Town of Hilton Head Island, South Carolina, Respondent.

PROOF OF SERVICE

I certify that I have served Appellant's Designation of Matter to Be Included in the Record on Appeal upon Respondent, the Town of Hilton Head Island, South Carolina, by emailing a copy of it on September 12, 2024, addressed to its attorney of record, Curtis L. Coltrane.

September 12, 2024



Jennifer J. Miller S.C. Bar No. 13116
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Attorneys for Appellant

Appellants Initial Brief and Designation, Appellate Case No. 2024-000961, Ryan McAvoy v. The Town of Hilton Head South Carolina

Jennifer Miller <jennifer.miller@carpenterlawfirm.net>

Thu 9/12/2024 11:36 PM

To:curtis@coltraneandwilkins.com <curtis@coltraneandwilkins.com>

Bcc:Jennifer Miller <jennifer@millerfamily.info>;James Carpenter <james.carpenter@carpenterlawfirm.net>

■ 5 attachments (3 MB)

Clerk of Court of Appeals 9.12.24.pdf; Appellants Initial Brief.pdf; Appellants Designation of Matter.pdf; Proof of Service for Appellants Initial Brief.pdf; Proof of Service for Appellants Designation of Matter.pdf;

Dear Mr. Coltrane,

Please find the attached Cover Letter to the Clerk of the Court of Appeals, Appellant's Initial Brief, Appellant's Designation of Matter to be Included in the Record on Appeal, and Proofs of Service for the same.

Best regards,
Jennifer J. Miller

Jennifer Miller | Appeals

P: (864) 235-1269 | **E:** JENNIFER.MILLER@CARPENTERLAWFIRM.NET

SENIOR ASSOCIATE Attorney

Carpenter Law Firm | WHEN IT'S WORTH FIGHTING FOR.

September 12, 2024

The Honorable Jenny Abbott Kitchings
Clerk of SC Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: *Ryan McAvoy v. Town of Hilton Head Island, South Carolina*
Appellate Case Number 2024-000961

Dear Ms. Kitchings:

Please find attached (by email) Appellant's Initial Brief, Appellant's Designation of Matter to be Included in the Record on Appeal, and both Proofs of Service for the same.

If you need anything else, please telephone me.

Sincerely yours,

A handwritten signature in black ink that reads "Jennifer J. Miller". The signature is written in a cursive, flowing style.

Jennifer J. Miller
THE CARPENTER LAW FIRM, PC

Enclosures
CC w/ enclosure: Curtis L. Coltrane

Curtis L. Coltrane
PO Box 6808
Hilton Head Island, SC 29938