

RECEIVED

Sep 16 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
The Honorable Roger M. Young, Sr., Circuit Court Judge

Appellate Case No. 2024-000064  
Case No. 2021-CP-10-05645

THE CHARLESTON SCHOOL OF LAW, LLC, a South Carolina limited liability company, .....Respondent.

v.

CITY OF CHARLESTON, a municipal corporation, and OMSHERA HOTEL GROUP, LLC, a North Carolina limited liability company, ..... Defendants,

of which CITY OF CHARLESTON, a municipal corporation, is the.....Appellant.

**RESPONDENT THE CHARLESTON SCHOOL OF LAW, LLC’S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent The Charleston School of Law, LLC designates the following materials to be included in the Record on Appeal:

- (1) Summons and Complaint filed on December 17, 2021, with Exhibits 1-38.
- (2) Amended Summons and Amended Complaint filed on December 22, 2021, with Exhibits 1-38.
- (3) Defendant OmShera Hotel Group, LLC’s Answer to Amended Complaint, Answer to Cross-claim, Counterclaim, and Crossclaim filed on February 25, 2022, with Exhibits A and B.
- (4) Defendant City of Charleston’s Amended Answer to Amended Complaint, Counterclaim, and Crossclaim filed on March 25, 2022, with Exhibits A and B.
- (5) Defendant City of Charleston’s Reply to Omshera Hotel Group, LLC’s Crossclaim filed on March 28, 2022.
- (6) Plaintiff’s Reply to Counterclaim of Omshera Hotel Group, LLC filed on April 4, 2022.
- (7) Plaintiff’s Reply to Counterclaim of City of Charleston filed on April 6, 2022.

- (8) Plaintiff's Motion for Judgment on the Pleadings as to Defendant City of Charleston, filed on November 7, 2022.
- (9) Plaintiff's Memorandum of Law in Support of Motion for Judgment on the Pleadings filed on September 14, 2023, with Exhibits A-G.
- (10) Defendant City of Charleston's Memorandum in Opposition to Plaintiff's Motion for Judgment on the Pleadings, filed on September 21, 2023.
- (11) Defendant City of Charleston's Motion for Reconsideration filed on November 30, 2023.
- (12) Plaintiff's Memorandum of Law in Opposition to Defendant City of Charleston's Motion to Alter or Amend filed on December 7, 2023.
- (13) Order Granting Motion for Judgment on the Pleadings filed on November 20, 2023.
- (14) Order Denying Defendant City of Charleston's Motion for Reconsideration filed December 13, 2023.
- (15) Transcript of Hearing before The Honorable Roger Young, Sr. on September 26, 2023, all pages.

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

Respectfully submitted,

ROSEN HAGOOD, LLC

By: Daniel F. Blanchard, III

H. Brewton Hagood (SC Bar #2438)

Daniel F. Blanchard, III (SC Bar #65432)

Mary Harriet Moore (SC Bar #105312)

40 Calhoun Street, Suite 450

Charleston, SC 29401

(843) 577-6726 (office)

Email: [bhagood@rosenhagood.com](mailto:bhagood@rosenhagood.com)

Email: [dblanchard@rosenhagood.com](mailto:dblanchard@rosenhagood.com)

Email: [mhmoore@rosenhagood.com](mailto:mhmoore@rosenhagood.com)

*Attorneys for Respondent The Charleston*

*School of Law, LLC*

September 16, 2024

Charleston, South Carolina.