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Oct 10 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
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2023-001454
CIVIL ACTION NO. 2020-CP-00356

Ron Christmas,

APPELLANT,

versus

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

RESPONDENTS.

**RESPONDENT SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION'S
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

South Carolina Department of Transportation (“SCDOT”), Respondent in the
above referenced matter, proposes the following be included in the Record on Appeal:

1. Complaint, filed April 3, 2020;
2. Amended Complaint, filed December 7, 2021;
3. Second Amended Complaint, filed November 30, 2022;
4. SCDOT Answer to Second Amended Complaint, filed December 9, 2022;
5. Form 4 Order, filed August 17, 2023;

6. Plaintiff's Exhibit 49 (City Map);
7. Plaintiff's Exhibit 166 (Tide Chart); and
8. Amended Transcript of Trial Held August 14-17, 2023 before The Honorable B. Alex Hyman (designated pages only); 1-102; 166-168; 176-238; 242-401; 404-457; 479-480; 512; and 539-701.

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

Respectfully submitted,

/s Carmen V. Ganjehsani

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**ATTORNEYS FOR RESPONDENT
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CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Respondent, South Carolina Department of Transportation, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated October 10, 2024, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

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A copy of the sent email is enclosed with this Certificate of Service.


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Dated: October 10, 2024.

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Subject: Appellate Case No. 2023-001454 Christmas v. Georgetown et al.
Date: Thursday, October 10, 2024 5:08:42 PM
Attachments: [2023-001454 Christmas v. SCDOT et al \(Designations of SCDOT\) \(3526087\).pdf](#)
[2023-001454 Christmas v. SCDOT et al \(Initial Respondent's Brief of SCDOT\) \(3525971\).pdf](#)

Please find served upon you Respondent South Carolina Department of Transportation's Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal in the above-referenced appeal.

Thank you,
Carmen Ganjehsani

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