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**Nov 06 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.

**AMENDED 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

*Court's Exhibit*

27. R. Castles Deposition Transcript

## Transcripts

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

JUSTIN O'TOOLE LUCEY, P.A.

*/s/Justin Lucey*

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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 **AMENDED 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 November 6, 2024.

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