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**Apr 04 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2025-000025  
Case No. 2023-CP-07-01905

Marie E. Walls, in her Capacity as Beaufort County  
Treasurer ..... Respondent,

v.

Beaufort County, a Body Politic Subdivision of the State  
of South Carolina, and John Robinson, in his Capacity as  
Interim Beaufort County Administrator ..... Appellants,

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

Pursuant to Rule 209, SCACR, Appellants designate the following material for inclusion in the record on appeal. Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to this appeal.

**Orders**

1. Order Granting in Part and Denying in Part Parties' Cross Motions for Preliminary Injunction, filed on December 4, 2024
2. Order Denying Defendants' Motion to Alter or Amend, filed on December 19, 2024

**Pleadings**

3. Summons & Complaint of Maria Walls, filed on October 5, 2023
4. Answer and Counterclaim of Defendants, filed on January 4, 2024

5. Reply of Maria Walls to Answer and Counterclaims of Defendants, filed on February 2, 2024

**Motions, Supporting Memoranda, & Other Filings**

6. Defendants' Motion for Preliminary Injunction and Supporting Memorandum, filed April 24, 2024
  - a. Exhibit A to Motion for Preliminary Injunction, Affidavit of John Robinson
  - b. Exhibit B to Motion for Preliminary Injunction, Affidavit of Katherine M. Mead
  - c. Exhibit C to Motion for Preliminary Injunction, March 2024 email correspondence
  - d. Exhibit D to Motion for Preliminary Injunction, Team First Training Day Agenda
  - e. Exhibit E to Motion for Preliminary Injunction, Beaufort County Employee Handbook – Revised 2.15.2024
  - f. Exhibit F to Motion for Preliminary Injunction, 4.10.24 and 4.11.24 emails between John Robinson and Maria Walls
7. Defendants' Motion for Partial Summary Judgment, filed June 14, 2024
  - a. Exhibit A to Motion for Partial Summary Judgment, Affidavit of John Robinson
  - b. Exhibit B to Motion for Partial Summary Judgment, Affidavit of Katherine M. Mead
  - c. Exhibit C to Motion for Partial Summary Judgment, Team First Training Day Agenda
  - d. Exhibit D to Motion for Partial Summary Judgment, Travel Request 28829 related to Employee No. 1
  - e. Exhibit E to Motion for Partial Summary Judgment, Travel Request 28830 related to Employee No. 2
  - f. Exhibit F to Motion for Partial Summary Judgment, Beaufort County Employee Handbook – Revised 2.15.2024
  - g. Exhibit G to Motion for Partial Summary Judgment, 4.10.24 and 4.11.24 emails between John Robinson and Maria Walls

8. Plaintiff Maria Walls' Motion for Preliminary Injunction, filed June 14, 2024
  - a. Exhibit A to Walls' Motion for Preliminary Injunction, Affidavit of Maria Walls
    - i. Exhibit A to Affidavit of Maria Walls, Beaufort County Ordinance 2023/22
    - ii. Exhibit B to Affidavit of Maria Walls, February 22, 2023 Travel Request
    - iii. Exhibit C to Affidavit of Maria Walls, 5.9.24, 4.10.24, and 4.11.24 emails between John Robinson and Maria Walls
    - iv. Exhibit D to Affidavit of Maria Walls, Beaufort County Personnel Handbook, effective date August 1, 2016
    - v. Exhibit E to Affidavit of Maria Walls, 1.24.24 and 2.13.24 emails between Maria Walls and Clarissa Bickham
    - vi. Exhibit F to Affidavit of Maria Walls, Beaufort County Personnel Change/Action Authorization Notice (Blank)
    - vii. Exhibit G to Affidavit of Maria Walls, 6.22.23 email from Eric Greenway to Maria Walls
    - viii. Exhibit H to Affidavit of Maria Walls, 2.6.2020 and 2.12.2020 emails between Ashley Jacobs and Michael Hatfield
  - b. Exhibit B to Walls' Motion for Preliminary Injunction, Affidavit of Gary Kubic
    - i. Exhibit A to Affidavit of Gary Kubic, August 15, 2016 Memorandum re Newly Adopted 2016 Beaufort County Personnel Handbook
9. Plaintiff Maria Walls' Memorandum in Support of Motion for Preliminary Injunction, filed June 21, 2024
  - a. Exhibit A to Walls' Memorandum in Support of Motion for Preliminary Injunction, Affidavit of Maria Walls
  - b. Exhibit B to Walls' Memorandum in Support of Motion for Preliminary Injunction, Beaufort County Council Agenda Item Summary for June 17, 2024 Finance Committee Meeting
  - c. Exhibit C to Walls' Memorandum in Support of Motion for Preliminary Injunction, 2016 Memorandum re Newly Adopted 2016 Beaufort County Personnel Handbook

10. Plaintiff Maria Walls' Proposed Order Granting Plaintiff's Motion for Preliminary Injunction and Denying Defendants' Motion for Preliminary Injunction, submitted on August 16, 2024
11. Defendants' Proposed Order Granting Defendants' Motion for Preliminary Injunction and Denying Plaintiff's Motion for Preliminary Injunction, submitted on August 16, 2024
12. Defendants' Objections to Plaintiff's Proposed Order, filed August 20, 2024
13. Defendants' Memorandum in Support of Motion for Partial Summary Judgment, filed September 6, 2024
  - a. Exhibit A to Defendants' Memorandum ISO MSJ, Beaufort County Employee Benefits Ordinance
  - b. Exhibit B to Defendants' Memorandum ISO MSJ, Beaufort County Budget Ordinance
  - c. Exhibit C to Defendants' Memorandum ISO MSJ, Beaufort County Procurement Ordinance
14. Plaintiff's Letter to The Honorable Jennifer B. McCoy, dated September 26, 2024
  - a. Exhibit A to Plaintiff's Letter, September 10 & 11, 2024, Transcript of Hearing in *Maria Walls v. Beaufort County and James Beckert*, 2020-CP-07-01635
15. Defendants' Letter to The Honorable Jennifer B. McCoy, dated October 3, 2024
16. Defendants' Motion to Alter or Amend the December 16, 2024 Order, filed December 16, 2024
  - a. Exhibit A to Defendants' Motion to Alter or Amend, redlined proposed amended order
  - b. Exhibit B to Defendants' Motion to Alter or Amend, as-filed December 16, 2024 Order
  - c. Exhibit C to Defendants' Motion to Alter or Amend, 4.11.24 and 5.9.2024 emails between John Robinson and Maria Walls

### **Transcripts**

17. Transcript of Hearing on June 25, 2024

18. Transcript of Hearing on September 10 & 11, 2024 (from *Maria Walls v. Beaufort County and James Beckert*, 2020-CP-07-01635)

**Other**

19. Notice of appeal, filed January 2, 2025

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

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*Attorneys for Appellants*

April 4, 2025

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
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Appellate Case No. 2025-000025  
Civil Action No. 2023-CP-07-01905

Maria E. Walls, in her capacity as Beaufort County  
Treasurer, ..... Respondent,

v.

Beaufort County, a body politic subdivision of the State of  
South Carolina and John Robinson, in his capacity as  
Interim Beaufort County Administrator, ..... Appellants.

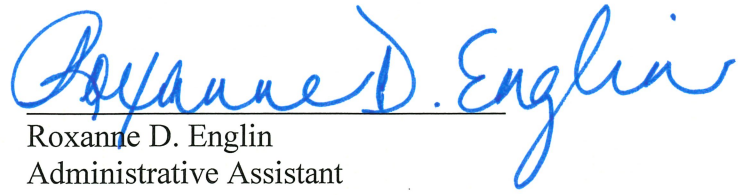
**PROOF OF SERVICE**

I, the undersigned Administrative Assistant, of the law offices of Nelson Mullins  
Riley & Scarborough LLP, attorneys for Beaufort County and John Robinson, do hereby certify  
that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified,  
pursuant to the Supreme Court Order 2022-05-06-04, and a copy of that electronic mail is attached  
to this certificate.

Pleading(s): **Designation of Matter**

Served: Michael E. Kozlarek  
John Marshall Mosser  
201 Riverplace, Suite 500 (29601)  
Post Office Box 565  
Greenville, South Carolina 29602  
[johnmarshall@kingkozlarek.com](mailto:johnmarshall@kingkozlarek.com)  
[michael@kingkozlarek.com](mailto:michael@kingkozlarek.com)

*Signature Page Attached*

  
Roxanne D. Englin  
Administrative Assistant

April 4, 2025

## Roxanne Englin

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**From:** Roxanne Englin  
**Sent:** Friday, April 4, 2025 11:39 AM  
**To:** John Marshall Mosser; Michael Kozlarek  
**Cc:** Mitch Brown; Brian Crotty; Meredith Keane; Eileen Hindman  
**Subject:** Walls v. Beaufort County, et al., 2025-000025 \*  
**Attachments:** Initial Brief of Appellants.pdf; Designation of Matter.pdf

Gentlemen,

Attached for service upon you in the above matter is the Initial Brief of Appellants and Designation of Matter, with a Proof of Service for each. This is the package that will be filed with the Court.

Thank you.



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ROXANNE ENGLIN SENIOR ADMINISTRATIVE ASSISTANT

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