

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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Appeal from the Charleston County  
Court of Common Pleas  
Roger M. Young, Sr., Circuit Court Judge

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Appellate Case No. 2024-001803

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**RECEIVED**  
**Apr 25 2025**  
**SC Court of Appeals**

Harold Simmons, Appellant,

v.

City of North Charleston, Respondent.

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**RESPONDENT'S DESIGNATION OF MATTERS  
TO BE INCLUDED IN RECORD ON APPEAL**

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Respondent City of North Charleston proposes the following be included in the Record on Appeal:

1. Order denying Appellant's Motion to Reconsider filed October 14, 2024
2. Order Affirming Ruling of the Municipal Court filed October 2, 2024
3. Respondent's Memorandum in Response to Appellant's Amended Notice of Appeal filed May 28, 2024
4. City's Motion for Rehearing filed October 16, 2023
5. Municipal Court letter dated September 12, 2023, re Motion Hearing
6. S.C. Atty. Gen. Op. dated October 8, 2002 (2002 WL 31728847)
7. Sec. 9-67 of the Code of Ordinances of the City of North Charleston
8. Sec. 9-85 of the Code of Ordinances of the City of North Charleston
9. Sec. 1-101 of the Code of Ordinances of the City of North Charleston

10. Notice of Appeal (to circuit court) filed October 11, 2024)
11. Amended Notice of Appeal (to circuit court) filed October 16, 2023)
12. Municipal Court's Return filed November 13, 2023
13. Motion for Reconsideration dated October 7, 2024
14. Transcript of hearing before Judge Myesha L. Brown on August 9, 2023
15. Transcript of hearing before Judge Roger Mr. Young, Sr. on August 19, 2024
16. Summons and Complaint filed on June 3, 2021, in Case No. 2021CP1002563, *City of North Charleston v. Harold Simmons, Jr. and Property Located at 3042 North Carolina Ave. TMS #469-16-00-329*
17. Order Complaint filed on July 7, 2021, in Case No. 2021CP1002563, *City of North Charleston v. Harold Simmons, Jr. and Property Located at 3042 North Carolina Ave. TMS #469-16-00-329*

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

April 25, 2025

Respectfully submitted,

/s David J. Parrish

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April 25, 2025