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**Nov 05 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas  
The Honorable R. Lawton McIntosh

Case No. 2020-CP-04-00085  
Appellate Case No. 2024-001911

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Moats Construction, Inc. and Russell Moats,

Appellants,

v.

Anderson County, Rusty Burns, Matt Schell, and Holt Hopkins,

Respondents

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APPELLANTS' DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

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Attorney for Appellants

Appellants Moats Construction, Inc. and Russell Moats designate the following matter to be included in the record on an appeal:

**Orders**

1. Order Granting New Trial (October 14, 2024)

**Judgments**

1. Jury Verdict Form (April 19, 2024)

**Pleadings and Motions**

2. Complaint (January 10, 2020)
3. Answer and Counterclaim of Anderson County (April 9, 2020)
4. Answer to Counterclaim of Moats (May 11, 2020)
5. Motion to Change Venue (April 10, 2024)
6. Anderson County's Post Trial Motions with Exhibits (April 29, 2020)
7. Moats Memorandum in Opposition Post Trial Motions (July 21, 2024)

**Transcripts**

8. Trial Transcript (April 15, 2024 – April 19, 2024)

**Exhibits**

9. Court's Exhibits
  - a. 1
  - b. 5
10. Plaintiff Exhibits
  - a. 1
  - b. 4
  - c. 9
  - d. 10
  - e. 11
  - f. 12
  - g. 14-17
  - h. 21-25
  - i. 28
  - j. 42
  - k. 43
  - l. 44

11. Defense Exhibits

- a. 1 - Binder
  - a. Tab 1
  - b. Tab 2
  - c. Tab 3
  - d. Tab 4
  - e. Tab 5
  - f. Tab 8
  - g. Tab 19
- b. 2

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

s/ David L. Paavola  
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