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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
Judge Steven DeBerry, IV, Circuit Court Judge

Appellate Case No. 2025-001618
Circuit Court Case No. 2022-CP-07-01195

Beaufort County, South Carolina,

Respondent,

v.

Adams Outdoor Advertising Limited Partnership,

Appellant.

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

Concurrent with the service of its initial brief, Appellant Adams Outdoor Advertising Limited Partnership ("Adams") designates the following to be included in the Record on Appeal:

Orders

1. Order on the Reconvened Deposition of Eric Greenway, filed October 24, 2024
2. Form Order on Cross-Motions for Summary Judgment, filed June 25, 2025
3. Order on the parties' Motions to Reconsider, filed July 14, 2025

Pleadings

4. Beaufort County, South Carolina's ("County") Amended Complaint, filed August 31, 2022 (pages 1-4, 9-11, 13-16)

5. Adams' Amended Answer to Amended Complaint and Counterclaims, filed December 8, 2023 (pages 1-4, 9-17, 41-42)

Transcripts

6. Transcript of June 10, 2025 Motion Hearing (transcript pages 1-4, 11, 23-25, 43-44, 58-63, 82, 85)

Exhibits and Other Materials

7. Adams' Motion for Summary Judgment, filed March 18, 2025 (pages 1-3, 7-8)
8. County's Motion for Summary Judgment, filed March 18, 2025 (pages 1-3)
9. County's Designation of Exhibits Supporting County's Summary Judgment Motion and Opposing Adams Outdoor's Summary Judgment Motion, filed May 30, 2025
10. County's Summary Judgment Exhibit 17, Letter from Adams to the County dated September 29, 2021 (filed May 30, 2025)
11. County's Summary Judgment Exhibit 18, Letter from the County to Adams dated December 1, 2021 (filed May 30, 2025)
12. County's Summary Judgment Exhibit 20, County's Deed to the Leased Property (filed May 30, 2025)
13. Adams' Memorandum in Support of its Motion for Summary Judgment, filed June 6, 2025 (pages 1-6, 45-47)
 - a. Exhibit 2: Lease Agreement
 - b. Exhibit 3: Excerpts of the Transcript of the Deposition of Beaufort County's Rule 30(b)(6), SCRCF, Designee, Robert Merchant (cover, transcript pages 1-2, 20-31, 34-57, 59-65, Witness Correction Sheet)
 - c. Exhibit 4: Consolidation Plat, Recorded in the Beaufort County R.O.D. Office on December 16, 2020, in Book 155, at Page 114
 - d. Exhibit 5: Beaufort County Council Agenda Item Summary for the Proposed Purchase of the Port Royal Island Battlefield Parcels
 - e. Exhibit 6: April 1, 2021 Letter from the County Administrator to Liz Mitchum
 - f. Exhibit 7: Beaufort County Ordinance No. 2020/12

- g. Exhibit 8: Excerpts of the Transcript of the Reconvened Deposition of Eric Greenway (cover, transcript pages 1-2, 13-14, 21-39)¹
 - h. Exhibit 9: Restrictive Easement recorded on December 30, 2020, in the Beaufort County R.O.D. Office, in Book 3953, Page 1610
 - i. Exhibit 10: Conservation Easement recorded on January 13, 2021, in the Beaufort County R.O.D. Office, in Book 3958, at Page 2410
 - j. Exhibit 16: Transcript of August 13, 2024 Motion Hearing (cover, transcript pages 1-4, 13-15, 22)
 - k. Exhibit 40: March 9, 2020 Emails Between the County Council Chairman and a Councilmember
- 14. County's Brief in Support of Motion for Summary Judgment, filed June 6, 2025 (pages 1-2, 13-14, 21-23, 26-27)
 - 15. Adams' Motion to Reconsider, filed July 3, 2025
 - a. Exhibit 1: Lease Agreement
 - b. Exhibit 2: Enlarged Version of the County's Termination Right in the Lease
 - 16. County's Motion to Reconsider, filed July 7, 2025 (pages 1-5)

[Certification and Signature Follow]

¹ Pursuant to the lower court's order entered October 24, 2024, the pages of this deposition transcript included in the publicly filed Record on Appeal will be redacted and/or filed under seal, and quotations of said transcript in any other matter in the Record will be redacted in the publicly filed version of the same. Copies of materials containing or constituting portions of said transcript will be submitted without redactions to the Court via means established by the Court.

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

s/Evan P. Williams

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January 6, 2026

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