

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**Jan 07 2026**

**SC Court of Appeals**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Mikell R. Scarborough, Circuit Court Judge

Case No. 2023-CP-10-00947  
Appellate Case No. 2025-001719

Henry Bailem, IV, Joseph Bailem, Sheila Bailem, Diane Jefferson,  
Michael Jefferson, Sr., Rashica Coakley, and Ann Bailey Simmons,

Appellants,

v.

County of Charleston, Town of Mount Pleasant, DRB Group South Carolina, LLC f/k/a Dan Ryan Builders South Carolina, LLC, Marie P. Howard, Lewis B. Howard, Jr., Lanelle P. Johnson, William Bailem, Sr., X Syvier Lynn Johnson, Sonia Maria Simmons, Kenneth Davis, Juanita Nelson, Titus Howard, Myeisha Howard, James Howard, and John Doe and Jane Doe, fictitious names used herein to designate the unknown heirs at law, distributes, and/or devisees of all persons who are minors or members of the Armed Forces of the United States of America, as contemplated by the Soldiers' and Sailors' Relief Act, 1940, as Amended, and all persons entitled to claim under and through any of them,

Defendants,

of which

County of Charleston, Town of Mount Pleasant, and DRB Group South Carolina, LLC f/k/a Dan Ryan Builders South Carolina, LLC are the

Respondents.

RESPONDENT DRB GROUP SOUTH CAROLINA, LLC F/K/A DAN RYAN BUILDERS SOUTH CAROLINA, LLC'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent DRB Group South Carolina, LLC f/k/a Dan Ryan Builders South Carolina,

LLC proposes the following be included in the Record on Appeal:

1. Summons and Complaint and Exhibits thereto;
2. Consent Order, January 26, 2024;
3. Amended Complaint and Exhibits thereto;
4. Answer of Defendant Town of Mount Pleasant to Plaintiffs' Amended Complaint and Counterclaim;
5. DRB Group South Carolina, LLC f/k/a Dan Ryan Builders South Carolina, LLC's Answer to the Amended Complaint and Counterclaim Against Plaintiffs;
6. Plaintiffs' Reply to Defendant County of Charleston's Counterclaim;
7. Form 4 Order, October 28, 2024;
8. Defendant County of Charleston's Answer to Amended Complaint;
9. Order, February 4, 2025;
10. DRB Group South Carolina, LLC's Motion for Summary Judgment and Memorandum in Support of Its Motion for Summary Judgment and Exhibits thereto;
11. Defendant County of Charleston's Notice and Motion for Summary Judgment;
12. Memorandum of Law in Support of County of Charleston's Motion for Summary Judgment and Exhibits thereto;
13. Defendant Town of Mount Pleasant's Notice of Motion, Motion, and Memorandum of Law in Support of Motion for Summary Judgment and Exhibits thereto;
14. Plaintiffs' Memorandum in Opposition to the Motions for Summary Judgment of Charleston County, the Town of Mt. Pleasant, and DRB Group South Carolina, LLC f/k/a Dan Ryan Builders South Carolina and Exhibits thereto;
15. Transcript of Hearing dated June 2, 2025;
16. Order Granting Summary Judgment;
17. Plaintiffs' Motion to Reconsider and Alter or Amend Judgment Pursuant to Rule 59(e), SCRCP and Supporting Memorandum;
18. Form 4 Order, August 1, 2025; and
19. Notice of Appeal.

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

Respectfully submitted,

ADAMS & REESE LLP

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-and-

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Carolina, LLC f/k/a Dan Ryan Builders South  
Carolina, LLC*

January 7, 2026

Columbia, South Carolina.