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**Mar 18 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
Court of Common Pleas Court

Hon. G.D. Morgan, Jr.  
Circuit Court Judge

Appellate Case No. 2026-000199

Dennis Floyd Bivens, APPELLANT

v.

York County by and through Joshua Edwards, York County Manager; Josh Reinhardt, York County Development Services Manager; and Jonathan Buono, York County Planning and Development Services Director, RESPONDENTS

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APPELLANT'S DESIGNATION OF MATTER FOR  
RECORD ON APPEAL

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Appellant here proposes the following documents of record to be included in the Record on Appeal before this court :

1. October 13, 2025 Summons and Complaint
2. November 17, 2025 Defendant's Motion to Dismiss
3. December 13, 2025 Plaintiff Reply to Defendant Motion to Dismiss
4. December 15, 2025 Defendant Memorandum in Support of its Motion to Dismiss
5. December 15, 2025 Exhibit-A December 27, 2022 letter York County to Judi Quinby
6. Defendant Exhibit-B – September 18, 2023 Ordinance No. 6623 adoption
7. Defendant Exhibit-C – September 18, 2023 Fee in Lieu (FILOT) agreement
8. Defendant Exhibit-D – Walter Buchanan Zoning Interpretation Checklist

9. Defendant Exhibit-E - York Planning & Development letter to Buchanan 2/16/2024
10. Defendant Exhibit-F – Board of Zoning Appeals Appeal Application
11. Defendant Exhibit-G – Board of Zoning Appeals May 30, 2024 Reversal Decision
12. Defendant Exhibit-H – Subchapter E Part 13 Zoning Compliance ordinances
13. December 16, 2025 Transcript of Oral Argument before Hon. G.D. Morgan, Jr.
14. Plaintiff Exhibit – Deed Restrictions – Filed December 17, 2025 (46 Pages)
15. Plaintiff Exhibit- Affidavit of M. Allison Love (filed in Supreme Court)
16. January 6, 2025 Form-4 Order of Hon. G.D. Morgan, Jr.
17. January 21, 2026 Formal Order granting in part and denying in part defendant’s motion to dismiss.
18. January 22, 2026 Notice of Appeal
19. January 22, 2026 Halford Letter delivery of Notice of Appeal and Notice as to permits

Respectfully submitted,

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*/s/ J. Cameron Halford*  
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ATTORNEY FOR APPELLANT

CERTIFICATE OF SERVICE

I hereby Certify that I am the attorney for Appellant in the above case and that I did on March 18, 2025 serve a copy of the foregoing APPELLANT DESIGNATION OF MATTER FOR RECORD ON APPEAL upon counsel for Respondent by efililing, and digital delivery as follows:

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