



THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Hon. Benjamin Alex Hyman, Circuit Court Judge

Civil Action No. 2025-CP-26-08430  
Appellate Case No. 2026-001016

Crazy Horse Saloon and Restaurant, Inc., Samantha Christian, Melissa Ferguson, Amy Robinson, and Carlos Castillo ..... Respondents

v.

Town of Atlantic Beach ..... Appellant,

v.

Dog Leg Right, LLC, Backbay Group, LLC, Michael J. Peter, Thomas P. Hughes, and Laura Jean Watson ..... Respondents.

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

Appellant designates the following materials to be included in the Record on Appeal:

**Orders**

1. Form 4 Order Granting Plaintiff's Motion for Temporary Injunction and Denying Defendant's Motion for Temporary Injunction, filed March 4, 2026
2. Order Granting Plaintiffs' Motion for Temporary Injunction and Denying Defendant's Motion for Temporary Injunction, filed March 30, 2026
3. Form 4 Order Denying Defendant's Motion to Reconsider, filed April 6, 2026

**Pleadings**

4. Amended Complaint for Declaratory Judgment and Injunctive Relief, Class Action, Complaint for Damages, Demand for a Jury Trial, filed October 31, 2025

- a. Exhibits A – E to Amended Complaint
- 5. Defendant’s Amended Answer and Affirmative Defenses and Counterclaim for Injunctive Relief, filed January 2, 2026
- 6. Plaintiffs/Counterdefendants’ Answer and Affirmative Defenses to Amended Counterclaim, filed February 3, 2026

### **Transcripts**

- 7. Transcript of February 24, 2026 Motion Hearing

### **Exhibits and Other Materials**

- 8. Plaintiff’s Motion for Temporary Injunction, filed November 19, 2026
  - a. Exhibit A
- 9. Defendant’s Motion for Temporary Injunction, filed January 7, 2026
- 10. Plaintiffs/Counterdefendants’ Response in Opposition to Defendants’ Motion for Temporary Injunction, filed February 9, 2026
- 11. Defendant’s Brief Supporting Its Motion for Temporary Injunction and Opposing Plaintiffs’ Motion for Temporary Injunction, filed February 13, 2026
  - a. Certification of Town Clerk
  - b. Ex. 1 – Sexually Oriented Business Ordinance (Ordinance No. 11-2025)
  - c. Ex. 2 – 2022 Business License Ordinance (Ordinance No. 1-2022)
  - d. Ex. 3 – Thee Dollhouse SOB License Application (11/20/2025)
  - e. Ex. 4 – Incompleteness Letter re: Thee Dollhouse SOB License Application (12/19/2025)
- 12. Additional Exhibits Admitted at February 24, 2026 Motion Hearing
  - a. Ex. 5 – Legislative Record for Ordinance (pp. 1-8, pp. 000001-000004, p. 003464, last two pages (Feb. 20, 2026 Certification of Public Records))
  - b. Ex. 6 – Plan and Development District Application
  - c. Ex. 7 – Town’s Response and Letter (August 19, 2025)
  - d. Ex. 8 – Lawsuit, Crazy Horse Saloon v. Hughes (Case No. 4:25-cv-06879)
  - e. Ex. 9 – Complaint and Other Documents (Case No. 2025CP2607036)

- f. Ex. 18 – Certified Public Record, DollHouse Website (Feb. 20, 2026)
13. Defendant’s Supplemental Brief in Support of Motion for Temporary Injunction re: Authorities Cited at Feb. 24, 2026 Hearing, filed February 26, 2026
14. Plaintiff’s Proposed Order, filed March 12, 2026
15. Defendant’s Notice of Motion and Motion to Reconsider, filed March 16, 2026
16. Plaintiff’s Proposed Order, presented to court via email on March 26, 2026

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

Respectfully submitted,

Date: August 28, 2026

s/ Virginia P. Bozeman

Virginia P. Bozeman, S.C. Bar # 104939

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**PROOF OF SERVICE**

I certify that on August 28, 2026, I served all counsel in this action with a copy of **Appellant's Designation of Matter to be Included in the Record on Appeal**, via electronic mail, to the following addresses:

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Respectfully submitted,

*s/ Virginia P. Bozeman*

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