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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY

Maite Murphy, Circuit Court Judge

Lower Court Case Number 2025-CP-18-00640

Deborah Bowles, Appellant,

v.

City of North Charleston, IMC Charleston, LLC, and Wescott Plantation, Defendants,

of which City of North Charleston is the Respondent.

Appellate Case No. 2026-000775

RESPONDENTS DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

REYNOLDS & STEPHENS, LLC

Lisa A. Reynolds

SC Bar No. 15527

Rebecca D. Wade

SC Bar No. 107799

1064 Gardner Rd., Suite 210

Charleston, SC 29407

(843) 804-9800

lreynolds@rslawsc.com

bwade@rslawsc.com

Attorneys for the City of North Charleston

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

1. The Honorable Diane S. Goodstein's Order dated June 11, 2025;
2. The Honorable Maite Murphy Order dated February 26, 2026;
3. Bowels Summons and Complaint filed March 20, 2025;
4. Dorchester County and Dorchester County Public Works Answer and Motions to Strike filed April 17, 2025;
5. Bowles Consent Motion to Amend the Complaint to Add Parties filed June 5, 2025;
6. Bowles Memorandum in Support of Motion to Add Parties filed June 5, 2025;
7. Stipulation of Dismissal of Dorchester County and Dorchester County Public Works filed June 16, 2025;
8. Affidavit of Service on City of North Charleston filed July 29, 2025 with attachments (unfiled Amended Summons and Amended Complaint, Consent Motion for Leave to Amend Complaint to Add Defendants City of North Charleston Public Works and IMC Charleston, LLC, Order to Add Parties City of North Charleston Public Works and IMC Charleston, LLC and Memorandum in Support of Motion to Leave to Amend Complaint to Add City of North Charleston and IMC Charleston, LLC.
9. City of North Charleston's Motion to Dismiss filed August 13, 2025;
10. City of North Charleston's Memorandum in Support of Motion to Dismiss dated November 12, 2025;
11. Amended Summons and Amended Complaint filed November 13, 2025;
12. Bowles Memorandum in Opposition to Defendant's Motion to Dismiss filed November 17, 2025;

13. Bowles Answers to Dorchester County and Dorchester County Public Work's Interrogatories dated May 16, 2025;
14. Bowles Supplemental Responses to Dorchester County and Dorchester County Public Work's Interrogatories dated May 21, 2025;
15. Email from James Hartman, Esq.'s office to Lisa Reynolds, Esq. dated May 21, 2025;
16. Email from James Hartman, Esq. to Lisa Reynolds, Esq. dated May 30, 2025;
17. Correspondence from Lisa Reynolds, Esq. to James Hartman, Esq. dated July 30, 2025 advising of being retained to represent the City of North Charleston; and
18. Transcript of November 17, 2025 hearing, pages 1-15.

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

Respectfully submitted:

[s/ Lisa A. Reynolds](#)

Lisa A. Reynolds

SC Bar No. 15527

Rebecca D. Wade

SC Bar No. 107799

1064 Gardner Rd., Suite 210

Charleston, SC 29407

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lreynolds@rslawsc.com

bwade@rslawsc.com

Attorneys for the City of North Charleston

September 4, 2026