

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM HORRY COUNTY

Court of Common Pleas

Larry B. Hyman, Circuit Court Judge

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Case No. 2013-CP-26-08446

(Court of Appeals Case No. 2014-000756)

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Marilyn Hatley, individually and as Mayor of the City of North Myrtle Beach, Michael G. Mahaney, Christopher Noury, and the City of North Myrtle Beach.....Respondents,

v.

William H. Bailey, Jr.....Appellant.

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

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

Appellant proposes that the following be included in the Record on Appeal:

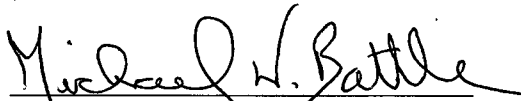
1. Complaint, dated and filed December 23, 2013.
2. Answer of Defendants, dated and filed January 15, 2014.

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SEP 05 2014

3. Defendants' Motion to Dismiss, dated and filed January 15, 2014.
4. Return to Motion to Dismiss dated March 5, 2014.
5. Order Granting Defendants' Motion to Dismiss Individual Defendants, dated March 20, 2014 and filed March 28, 2014.
6. Transcript of Record dated March 5, 2014.
7. Notice of Appeal dated April 2, 2014.
8. Trial Court Order dismissing individuals in *Mitchell Bellamy v. Marilyn Hatley, et. al.* C/A No.: 2013-CP-26-07765.

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



Michael W. Battle, SC Bar # 00584

Battle Law Firm LLC

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(843) 248-4321

Attorneys for Respondents

September 2, 2014

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
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Honorable Larry B. Hyman, Circuit Court Judge

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Case No. 2013-CP-26-08446

Appellate Case No. 2014-000756

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William H. Bailey, Jr. .... *Appellant,*

v.

Marilyn Hatley, individually and as Mayor of  
the City of North Myrtle Beach, Michael G.  
Mahaney, Christopher Noury,  
and the City of North Myrtle Beach ..... *Respondents.*

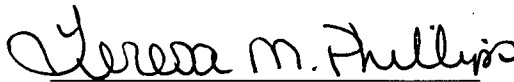
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PROOF OF SERVICE

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Teresa M. Phillips certifies that she is a Paralegal with Battle Law Firm, LLC, attorneys for Respondent City of North Myrtle Beach and that she has mailed Respondent City of North Myrtle Beach's Initial Brief and Designation of Matter to be included on the Record on Appeal to the addressee shown this 2<sup>nd</sup> day of September, 2014, with proper postage attached thereto.

Kenneth R. Moss  
628A Sea Mountain Highway  
North Myrtle Beach, SC 29566



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**SC Court of Appeals**

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September 2, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 116929  
Columbia, SC 29211

RE: William H. Bailey, Jr. v. Marilyn Hatley, et al  
C/A No.: 2013-CP-26-08466  
Appellate C/A No: 2014-000756

Dear Ms. Kitchings:

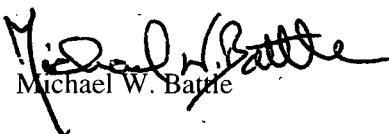
I have enclosed for filing the original and one copy of the Respondent's Initial Brief and Designation of Matter on Behalf of The City of North Myrtle Beach ("City"), as well as our Proof of Service.

By copy of this letter to all counsel involved in this Appeal, I am serving them with a copy of this Brief and Designation of Matter and enclose a Proof of Service to that effect.

Please return a "clocked" copy of the Proof of Service. I have enclosed an extra copy of Proof of Service, as well as a self-addressed, stamped envelope for your convenience.

I appreciate your assistance in this matter.

Sincerely,

  
Michael W. Battle

Enclosure: stated  
C: Kenneth R. Moss, Chris Noury

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**SC Court of Appeals**