

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JAN 07 2015

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

G. Thomas Cooper, Jr., Circuit Court Judge

Case No. 2012-CP-40-7392
Appellate Case No.: 2014-001728

Frank "Doc" Haynie,Appellant,

v.

The City of Forest Acres, Mark W. Williams,
Shaun Greenwood, and Clark Frady, in their individual capacities, Respondents.

RESPONDENTS MARK W. WILLIAMS, SHAUN GREENWOOD AND CLARK FRADY'S
DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

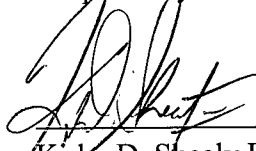
Pursuant to Rule 209 of the *South Carolina Appellate Court Rules*, Respondents Mark W. Williams, Shaun Greenwood, and Clark Frady propose that the following be included in the Record on Appeal:

1. Order Denying Plaintiff's Consolidated Rule 59(e) Motion to Alter or Amend Judgment, filed June 30, 2014;
2. Order Granting Defendant City of Forest Acres' Motion for Summary Judgment, filed April 14, 2014;
3. Order Granting Individual Defendants' Motion for Summary Judgment, filed April 14, 2014;
4. Complaint, filed November 2, 2012;

5. Answer of City of Forest Acres, filed January 24, 2013;
6. Amended Answer of Mark W. Williams, Shaun Greenwood and Clark Frady, filed January 25, 2013;
7. Transcript of Summary Judgment hearing, February 21, 2014;
8. Defendant City of Forest Acres' Motion for Summary Judgment, filed December 23, 2013, including all exhibits attached thereto;
9. Individual Defendants' Motion for Summary Judgment, filed December 27, 2013, including all exhibits attached thereto or referred to therein and amended exhibit F;
10. Plaintiff's Memorandum in Opposition to Defendants' Motions for Summary Judgment, filed February 11, 2014, including all exhibits attached thereto;
11. Plaintiff's Consolidated Rule 59(e) Motion to Alter or Amend Judgment, filed April 28, 2014;
12. Individual Defendants' Memorandum in Opposition to Consolidated Rule 59(e) Motion to Alter or Amend Judgment, filed June 17, 2014;
13. Defendant City of Forest Acres' Memorandum in Opposition to Plaintiff's Consolidated Rule 59(e) Motion to Alter or Amend Judgment, filed June 18, 2014;
14. Notice of Appeal, dated August 7, 2014.

The undersigned certifies that this designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted,



Kirby D. Shealy III

Lyndey Ritz Zwing

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*Attorneys for Respondents Mark W. Williams,
Shaun Greenwood, and Clark Frady, in their
individual capacities*

January 7, 2015.

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Frank "Doc" Haynie,Appellant,

v.

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in their individual capacities, Respondents.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Respondents Mark W. Williams, Shaun Greenwood and Clark Frady, along with Respondents' Designation of Matter to Be Included in the Record on Appeal, on Appellant Frank "Doc" Haynie and Respondent The City of Forest Acres by depositing copies in the United States Mail, postage prepaid, addressed to Appellant's attorneys of record, J. Lewis Cromer, Esquire and J. Paul Porter, Esquire at J. Lewis Cromer & Associates, LLC, Post Office Box 11675, Columbia, SC 29211, as well as Respondent's attorney of record, A. Johnston Cox, Esquire at Gallivan White & Boyd, PA, Post Office Box 7368, Columbia, SC 29202.


Victoria Moody – Paralegal

January 7, 2015.

January 7, 2015

VIA Hand Delivery:

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Kirby D. Shealy III
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RE: *Frank "Doc" Haynie v. The City of Forest Acres, Mark Williams,
Shaun Greenwood, and Clark Frady, in their individual capacities*
Civil Action No.: 2012-CP-40-7392
Appellate Case No. 2014-001728
A&R File No. 050102-000002

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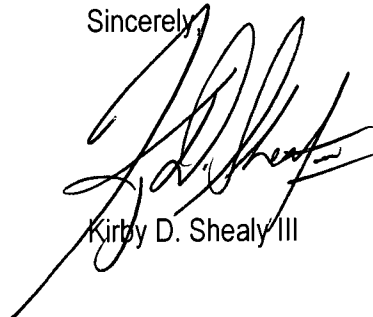
JAN 07 2015

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter are the original and one copy of the Initial Brief of Respondents Mark W. Williams, Shaun Greenwood and Clark Frady, as well as Respondents' Designation of Matter to Be Included in the Record on Appeal. Please file the original of each document and return the clocked-in copies to me via our courier. By copy of this letter, I am serving all counsel of record with the brief and designation as set forth in the enclosed Proof of Service. Thank you for your attention to this matter.

Sincerely,



Kirby D. Shealy III

KDSIII/vhm
Enclosures

cc: J. Lewis Cromer, Esquire
J. Paul Porter, Esquire
A. Johnston Cox, Esquire