

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECORDED

APR 20 2015

SC Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Roger L. Couch, Circuit Court Judge

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Case No. 2009-CP-04-4528

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Richard Freemantle, individually and on behalf of  
himself and all others similarly situated, ..... Appellant,

v.

Joey Preston, in His Official Capacities and Individually,  
While Administrator of Anderson County, Anderson County,  
a Political Subdivision of the State of South Carolina,  
Anderson County Council, the Legislative and  
Executive Body of Anderson County, Ron Wilson, in  
His Official Capacities and Individually, Bill McAbee, in  
His Official Capacities and Individually, Larry Greer, in  
His Official Capacities and Individually, Michael Thompson,  
in His Official Capacities and Individually and  
Gracie Floyd, in Her Official Capacities and Individually, ..... Respondents.

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

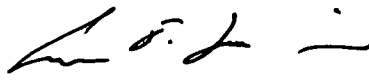
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The Respondents Joey Preston, Ron Wilson, Bill McAbee, Larry Greer, Michael Thompson and Gracie Floyd propose that the following be included in the Record on Appeal:

1. Order Granting Defendants' Motion for Summary Judgment, filed November 6, 2014
2. Amended Complaint
3. Answer of Defendants Preston, Wilson, Greer, Thompson and Floyd to Plaintiff's Amended Complaint
4. Notice of Motion and Motion for Summary Judgment, filed May 28, 2014
5. Motion for Summary Judgment, filed June 4, 2014
6. Memorandum in Motion for Summary Judgment filed by Defendants Joey Preston, Ron Wilson, Bill McAbee, Larry Greer, Michael Thompson and Gracie Floyd, filed August 21, 2014

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

DAVIDSON & LINDEMANN, P.A.

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Columbia, South Carolina

April 15, 2015

THE STATE OF SOUTH CAROLINA  
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His Official Capacities and Individually, Michael Thompson,  
in His Official Capacities and Individually and  
Gracie Floyd, in Her Official Capacities and Individually, ..... Respondents.

**CERTIFICATE OF SERVICE**

The undersigned employee of Davidson & Lindemann, P.A. does hereby  
certify that service of the **Initial Brief of Respondents Preston, Wilson, McAbee,  
Greer, Thompson and Floyd and Respondents' Designation of Matter to be**

**Included in the Record on Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 15th day of April 2015:

Charles R. Griffin, Jr., Esquire  
The Griffin Firm, LLC  
210 North McDuffie Street - Suite 103  
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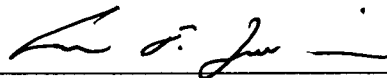
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DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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APR 20 2015

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SC Court of Appeals

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†Certified Mediator

April 15, 2015

Of Counsel  
Kenneth P. Woodington

Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Richard Freemantle v. Joey Preston, et al.  
Civil Action Number: 2009-CP-04-4528  
Appellant Case Number: 2014-002614  
Claim Number: 59885  
Our File Number: 103.8296

Dear Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the **Initial Brief of Respondents Preston, Wilson, McAbee, Greer, Thompson and Floyd** and **Respondents' Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me in the enclosed envelope.

By copy of this letter, I am serving copies on all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

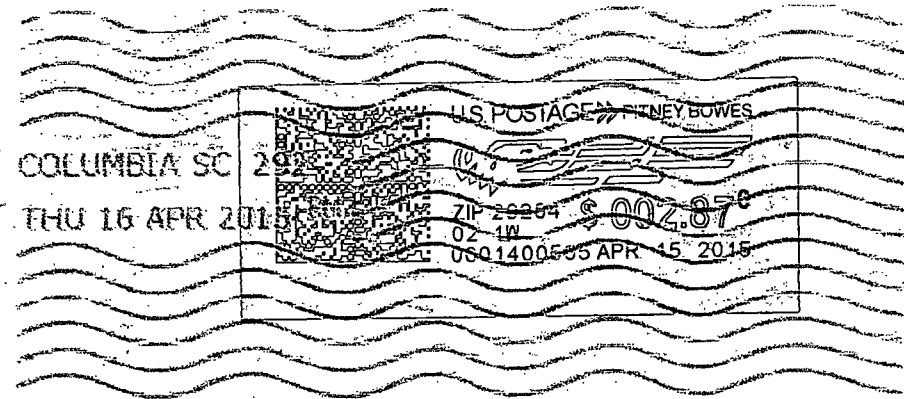
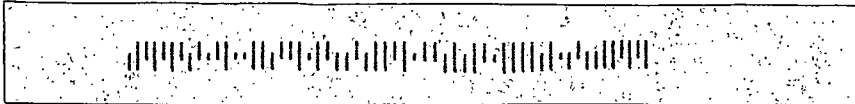
AFL/  
Enclosures

The Honorable Jenny Abbott Kitchings  
April 15, 2015  
Page Two

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cc: (w/Enclosures)

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James W. Logan, Jr., Esquire  
Kevin W. Sturm, Esquire  
D. Randle Moody, II, Esquire  
Joseph O. Smith, Esquire  
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