

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

APR 20 2015

APPEAL FROM BERKELEY COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

SC Court of Appeals

Case No. 2011-CP-08-2814

Todd Olds..... Appellant,

vs.

City of Goose Creek Respondent,

APPELLANT'S DESIGNATION OF CONTENTS OF RECORD ON APPEAL



April 14, 2015

Thomas R. Goldstein, #2186
Belk, Cobb, Infinger & Goldstein, P.A.
Attorneys for Respondent
P. O. Box 711121
N. Charleston, South Carolina 29415-1121
(843) 554-4291; (843) 554-5566 (fax)
E-mail: tgoldstein@cobblaw.net

Other counsel of Record:
Timothy A. Domin, Esq.
Clawson & Staubes, LLC
126 Seven Farms Drive (Suite 200)
Daniel Island, S.C. 29492

ORDERS

- Hon R. Markley Dennis, Jr. September 15, 2014 (Granting Summary Judgment)
- Hon. R. Markley Dennis, Jr. October 4, 2014 (Denying Reconsideration)
- Hon. Stephanie P. McDonald, June 16, 2014 (Granting Motion to Amend)
- Hon. Kristi Harrington, October 8, 2012 (Denying Injunction)

PLEADINGS

Complaint October 12, 2011
Amended Complaint
Answer November 21, 2011
Amended Answer July 21, 2014
Motion for Injunction
Motion for Reconsideration on Injunction
Motion to Amend Complaint
Notice of Appeal

AFFIDAVITS

Affidavit of Todd Olds
Supplemental affidavit of Todd Olds
Second Supplemental affidavit of Todd Olds
Affidavit of Robert Eckhardt
Affidavit of Kristin Gutting

MEMORANDA

Plaintiff Memorandum in Support of Injunction
Plaintiff Memorandum in Support of Summary Judgment
Defendant's Memorandum in Support of Summary Judgment with attachments

TRANSCRIPTS

Transcript of Appeal Hearing before Town Council
Transcript of Motion for Summary Judgment

Certificate of Counsel

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

April 14, 2015



Thomas R. Goldstein, #2186
Belk, Cobb, Infinger & Goldstein, P.A.
P. O. Box 71121
N. Charleston, S. C. 29415-1121
(843) 554-4291

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2011-CP-08-2814

RECEIVED
APR 20 2015
SC Court of Appeals

Todd Olds..... Appellant,

vs.

City of Goose Creek Respondent,

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant and Designation of Contents of Record on Appeal on the Respondent, City of Goose Creek, by depositing a copy of it in the United States Mail, postage prepaid, on April 14, 2015, addressed to its attorney of record, Timothy A. Domin, 126 Seven Farms Drive, Suite 200, Daniel Island, S. C. 29492.

April 14, 2015



Thomas R. Goldstein, #2186
Belk, Cobb, Infinger & Goldstein, P.A.
P. O. Box 71121
N. Charleston, S. C. 29415-1121
(843) 554-4291; (843) 554-5566 fax
Attorneys for the Appellant

BELK, COBB, INFINGER AND GOLDSTEIN, P.A.

Harry C Belk (1919-2003)

Dale T Cobb, Jr
dtcobbaw@hotmail.com

Peggy M Infinger
pinfinger@cobblaw.net

Thomas R Goldstein
tgoldstein@cobblaw.net

ATTORNEYS AT LAW
2344 COSGROVE AVENUE
CHARLESTON, SC 29405

Mailing Address
PO Box 71121
Charleston, SC
zip 29415-1121
Ph (843) 554-4291
Fax (843) 554-5566

April 13, 2015

RECEIVED

APR 20 2015

SC Court of Appeals

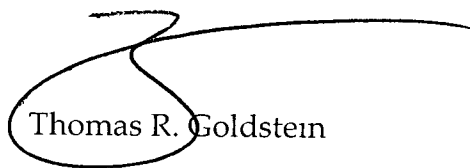
Hon Jenny Abbott Kitchings
Clerk of Court,
South Carolina Court of Appeals
P. O. Box 11629
Columbia, S. C. 29211

Re: Todd Olds vs. City of Goose Creek, Appellate Case No : 2014-002393

Dear Ms. Kitchings,

I enclose an original and extra copy of the Appellant's Initial Brief and Designation of Matters to be Included in the Record on Appeal along with a Certificate of Service and Certificate of Compliance. I ask that you please file the original with the court and return a filed copy to me in the envelope provided. By copy of this letter to Tim Domin, I am serving a copy of the Initial Brief and Designation of Matters to be Included in the Record on Appeal upon opposing counsel. With kind regards, I am

Very truly yours,
BELK, COBB, INFINGER & GOLDSTEIN, P.A.



Thomas R. Goldstein

TRG/ral
enclosure: Initial Brief, return envelope
cc Tim Domin, Esq.
Todd Olds