

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APR 30 2015

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

R. Markley Dennis, Jr., Circuit Court Judge

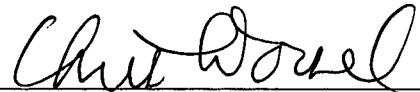
Case No.: 2014-002575

ROOSEVELT SIMMONS,Appellant,

v.

MASE and COMPANY, LLC,
J. AL CANNON, JR., CHARLESTON
COUNTY SHERIFF'S DEPT.,
CHARLESTON COUNTY REVENUE
COLLECTIONS DEPT., and HARRY LONG,.....Respondents.

**J. AL CANNON, JR., CHARLESTON COUNTY SHERIFF'S DEPT.,
CHARLESTON COUNTY REVENUE COLLECTIONS DEPT., and HARRY
LONG'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL**



CHRISTOPHER T. DORSEL
Senn Legal, LLC
P.O. Box 12279
Charleston, SC 29422
(843) 556-4045
Attorney for Respondents J. Al
Cannon, Jr., Charleston County
Sheriff's Dept., Charleston County
Revenue Collections Dept., and
Harry Long

Respondents J. Al Cannon, Jr., Charleston County Sheriff's Dept., Charleston County Revenue Collections Dept., and Harry Long propose that the following be included in the Record on Appeal:

1. Complaint filed on February 11, 2011.
2. Amended Complaint filed on March 23, 2011.
3. Second Amended Complaint filed on October 15, 2011.
4. Plaintiff's Motion to Dismiss filed on November 7, 2011.
5. Order of Remand filed on February 6, 2012.
6. Plaintiff's Motion to Amend Second Amended Complaint filed on April 2, 2012.
7. County Defendants' Memorandum in Support of Motion for Summary Judgment filed on July 27, 2012.
8. County Defendants' Response in Opposition to Plaintiff's Motion to Amend Second Amended Complaint filed on August 14, 2012
9. County Defendants' Amended Supplemental Memorandum in Support of Summary Judgment filed on September 4, 2012.
10. Plaintiff's Motion for Partial Summary Judgment filed on July 6, 2012.
11. County Defendants' Opposition to Motion for Partial Summary Judgment filed on August 14, 2012.
12. County Defendants' Amended Memorandum in Opposition to Motion for Partial Summary Judgment filed on September 4, 2012.
13. County Defendants' Motion to Reconsider filed on November 29, 2012.
14. Plaintiff's Motion to Alter or Amend filed on December 6, 2012.
15. Transcript of November 7, 2012 hearing.
16. Transcript of March 20, 2013, hearing.
17. Email between court and counsel.
18. Order filed on June 21, 2013.
19. Affidavit of Roosevelt Simmons filed on August 2, 2012.

20. Solid Waste Disposal and Resource Recovery System, Charleston County Code of Ordinances, Part II, Chapter 10, Article IV.
21. Plaintiff's Motion to Alter or Amend filed on July 10, 2013.
22. Final Order filed on October 20, 2014.
23. Transcript of Judgment filed on September 19, 2000.
24. Partial Satisfaction of Judgment filed on 9, 2009.
25. Excerpts from deposition of Roosevelt Simmons taken on October 10, 2011.
26. Plaintiff's Amendment to Second Amended Complaint November 30, 2012.

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**RESPONDENTS J. AL CANNON, JR., CHARLESTON COUNTY
SHERIFF'S DEPT., CHARLESTON COUNTY REVENUE COLLECTIONS
DEPT., and HARRY LONG'S PROOF OF SERVICE**

I certify that I have served copies of Respondents J. Al Cannon, Jr., Charleston County Sheriff's Dept., Charleston County Revenue Collections Dept., and Harry Long's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Motion under Rule 208 (b)(5) SCACR to Exceed Length of Brief by depositing a copy of each in the United States Mail, postage prepaid, on April 28th, 2015 addressed to attorneys of record Edward A. Bertele, 1812 Pierce Street, Charleston, South Carolina 29492 and Wendy J. Keefer, Keefer & Keefer, LLC, 1643B Savannah Highway, Suite 226, Charleston, South Carolina 29492.



CHRISTOPHER T. DORSEL
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chris@sennlegal.com

April 28, 2015

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

RE: Roosevelt Simmons v. Mase and Company, LLC, et al, South Carolina Court of Appeals (Case No. 2014-002575)

Dear Clerk:

Enclosed for filing on behalf of Respondents J. Al Cannon, Jr., Charleston County Sheriff's Dept., Charleston County Revenue Collections Dept., and Harry Long please find an original and one copy of the following:

- (1) Initial Brief
- (2) Designation of Matter to be Included in the Record on Appeal;
- (3) Motion Under Rule 208(b)(5) SCACR to Exceed Length of Brief (with a firm check in the amount of \$25.00 representing the filing fee for the Motion); and
- (4) Proof of Service of the above.

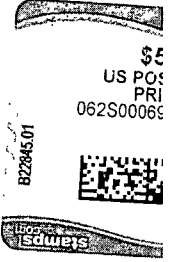
Please file the original and return file-stamped copies to me in the self-addressed, stamped envelope enclosed for your convenience. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Christopher T. Dorsel

llc
Enclosures

cc: *(with copy of enclosures)*
Wendy J. Keefer
Edward A. Bertele



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SC Court of Appeals

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*The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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