

APPEAL FROM THE ADMINISTRATIVE LAW COURT

SC Court of Appeals

Shirley C. Robinson, Administrative Law Judge

Appellant Case No. 2015-000602

Dan Abel and Mary Abel,

Appellants,

vs.

South Carolina Department of Health and Environmental Control and
Pawleys Island Community Church,

Respondents.

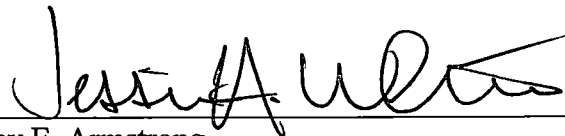
**APPELLANTS' DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

The Appellants propose the following material to be included in the Record on Appeal:

1. Order Granting Motion to Dismiss and Denying Motion to Consolidate, Motion to Enforce, and Motion for Summary Judgment, dated February 12, 2015
2. Order (granting withdrawal of William Mashburn), dated October 29, 2014
3. Scheduling Order, dated September 3, 2014
4. Order for Prehearing Statements, dated July 9, 2014
5. DHEC Board Denial Letter, May 14, 2014
6. Request for Final Review Conference, dated April 16, 2014
7. Request for Contested Case Hearing, dated June 13, 2014

8. Department's Prehearing Statement, dated July 29, 2014
9. Petitioners' Prehearing Statement, dated July 29, 2014
10. Pawleys Island Community Church's Prehearing Statement, dated August 5, 2014
11. Petitioners' Motion to Enforce Consent Order and to Consolidate, dated November 25, 2014
12. Memorandum in Support of Respondents Pawleys Island Community Church and South Carolina Department of Health and Environmental Control's Motion to Dismiss, dated December 12, 2014
13. Respondents' Reply to Motion to Enforce Consent Order and to Consolidate, dated December 12, 2014
14. Petitioners' Motion for Summary Judgment, dated December 15, 2015
15. Petitioners' Reply to Joint Response on Motion to Enforce Consent Order and to Consolidate, dated December 23, 2014
16. Department's Response in Opposition to Petitioners' Motion for Summary Judgment, dated December 30, 2014
17. Petitioners' Response to Joint Motion to Dismiss, dated January 6, 2015
18. Church's Response in Opposition to Petitioners' Motion for Summary Judgment, dated January 7, 2015
19. Petitioners' Reply on Motion for Summary Judgment, dated January 14, 2015
20. Geer Deposition Exhibit 4

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



Amy E. Armstrong
Amelia Thompson
Jessie A. White

SOUTH CAROLINA ENVIRONMENTAL LAW
PROJECT

Mailing address: Post Office Box 1380
Pawleys Island, SC 29585

Office address: 430 Highmarket Street
Georgetown, SC 29440

Telephone (843) 527-0078

FAX (843) 527-0540

Attorneys for the Appellants

Georgetown, South Carolina

June 15, 2015

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Appellant Case No. 2015-000602

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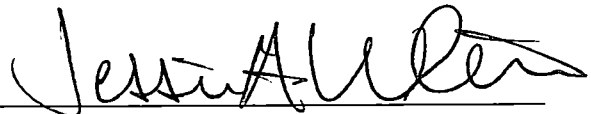
Respondents.

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Initial Brief and Designation of Appellants on Respondents SCDHEC and Pawleys Island Community Church by placing copies of same in the U.S. Mail addressed to:

Daniel W. Stacy, Jr., Esquire
Oxner & Stacy, PA
90 Wall Street
Pawleys Island, SC 29585

Nathan M. Haber, Esquire
SCDHEC/OCRM
1362 McMillan Avenue, Suite 400
Charleston, SC 29405



Jessie A. White

Georgetown, South Carolina
June 15, 2015



The South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

June 15, 2015

a 501c3
non-profit organization

Amy E. Armstrong
Executive Director
Amelia A. Thompson
Staff Attorney
Jessie A. White
Staff Attorney

Honorable Jenny Abbott Kitchings
Clerk, Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

OFFICE ADDRESS
430 Highmarket Street
Georgetown, SC 29440

Re: Dan Abel and Mary Abel v. SCDHEC and Pawleys Island
Community Church;
Appellate Case No. 2015-000602

MAILING ADDRESS
P.O. Box 1380
Pawleys Island, SC 29585

Dear Ms. Kitchings:

(843) 527-0078
Fax (843) 527 0540
E-mail amy@scelp.org
amelia@scelp.org
jessie@scelp.org

Enclosed for filing please find the Appellants' Initial Brief and Designation of Matter, along with my Certificate of Service in the above-referenced case.

BOARD OF DIRECTORS

Frances Close
Chairperson

Please return a clocked-in copy in the self-addressed, stamped envelope provided.

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Gary W. Poliakoff, Esq.
Leon Rice, Esq.
Robert Schofield
Greg VanDerwerker, MD
Nancy Vinson
Wendy Zara

Thank you very much for your kind cooperation and assistance.

Yours very truly,

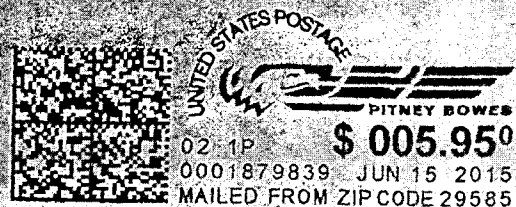
Jessie A. White

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Daryl Hawkins

cc: Nathan M. Haber, Esq.
Daniel W. Stacy, Jr., Esq.

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Carolina Environmental Law Project
Post Office Box 1380
Pawleys Island, South Carolina 29585



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Honorable Jenny Abbott Kitchings
Clerk, Court of Appeals
P.O. Box 11629
Columbia, SC 29211