

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
The Honorable Kristi L. Harrington, Circuit Court Judge

RECEIVED

JUL 16 2015

Lower Court Case No. 2014-CP-08-1840
Appellate Case No. 2015-000713

SC Court of Appeals

BP Amoco Chemical Company.....Plaintiff/Appellant,

v.

City of Charleston; Tract 7, LLC; Cainhoy Land & Timber, LLC; and Southern Timber, LLC.....Defendants,

Of whom Cainhoy Land & Timber, LLC and Southern Timber, LLC are Respondents.

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

Appellant BP Amoco Chemical Company designate the following to be included in the Record on Appeal:

1. Complaint dated August 15, 2014.
2. Defendant Cainhoy Land & Timber's Motion to Dismiss dated September 30, 2014.
3. Defendant Southern Timber, LLC's Motion to Dismiss dated September 30, 2014.
4. Plaintiff's Memorandum in Opposition to Defendants Motions to Dismiss dated October 16, 2014.
5. Defendant Cainhoy Land & Timber's Memorandum in Support of Motion to Dismiss dated October 16, 2014.
6. Order Granting Motion to Dismiss dated November 13, 2014.

7. Transcript of Hearing on October 20, 2014.
8. Plaintiff's Motion for Reconsideration dated November 24, 2014.
9. Defendants' Memorandum in Opposition to Motion for Reconsideration dated January 5, 2015 .
10. Plaintiff's Reply to Opposition to Motion for Reconsideration dated January 7, 2015.
11. Order Denying Plaintiff's Motion for Reconsideration dated March 2, 2015.

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

Respectfully submitted,



Douglas M. Muller
Trudy H. Robertson
E. Brandon Gaskins
Moore & Van Allen, PLLC
40 Calhoun Street, Suite 300
P.O. Box 22828
Charleston, SC 29413-2828
(843) 579-7000 Telephone
(843) 579-7099 Facsimile

Attorneys for Appellant BP Amoco
Chemical Company

July 13, 2015

Charleston, South Carolina

RECEIVED
JUL 16 2015
SC Court of Appeals

Moore & Van Allen

July 13, 2015

E. Brandon Gaskins
Attorney at Law

T 843 579 7038
F 843 579 8738
brandongaskins@mvalaw.com

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

Moore & Van Allen PLLC

78 Wentworth St.
Charleston, SC 29401-1428

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

**Re: BP Amoco Chemical Company v. City of Charleston; Tract 7, LLC; Cainhoy Land & Timber, LLC; and Southern Timber, LLC
Appellate Case No. 2015-000713**

Dear Ms. Kitchings:

Enclosed for filing, please find an original and one (1) copy of each of the following:

- (1) Initial Brief of Appellant;
- (2) Appellant's Designation of Matter to be Included in the Record on Appeal; and
- (3) Proof of Service.

Please file the originals and return the date-stamped copy of each to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving a copy of the foregoing pleading on counsel of record.

Sincerely,

Moore & Van Allen, PLLC

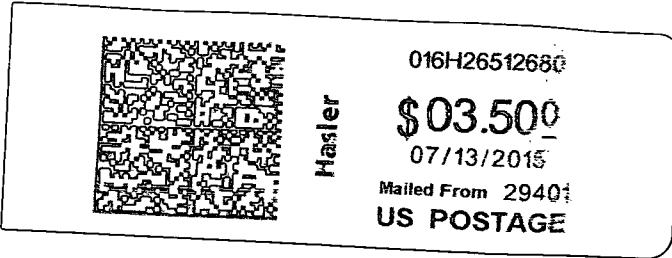
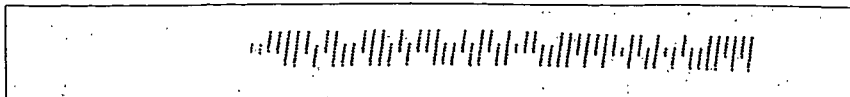


E. Brandon Gaskins

EBG/ws

Enclosures- as stated

cc: M. Dawes Cooke, Jr., Esquire
D. Summers Clarke, II, Esquire
Frances I. Cantwell, Esquire
Charlton de Saussure, Jr., Esquire
Nathan Haber, Esquire



Moore & Van Allen

Moore & Van Allen PLLC
78 Wentworth Street
Post Office Box 22828
Charleston, SC 29413-2828

RECEIVED
JUL 16 2015
SC Court of Appeals

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

8669/39124.02