

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  
Appellate Case No. 2014-002393

**RECEIVED**  
JUL 17 2015  
SC Court of Appeals

Todd Olds ..... Appellant,

v.

City of Goose Creek ..... Respondent.

**RESPONDENT'S DESIGNATION OF MATERIALS  
TO BE INCLUDED IN THE RECORD ON APPEAL**

1. Complaint, Amended Complaint
2. Answer, Answer to Amended Complaint
3. Motion for Injunction
4. Order Denying Motion for Injunction signed by Judge Kristi L. Harrington
5. Cross Motions for Summary Judgment and Motion for Hearing on the Appeal and for Dismissal or Summary Judgment of any Remaining Claims
6. Defendant's Second Motion for Summary Judgment
7. Defendant's Motion for a Decision/Hearing on the Appeal
8. Materials submitted at the Hearing on Summary Judgment before Judge Dennis
  - a. City of Goose Creek Memorandum in Support of Its Position on Appeal and in Support of Its Motion for Summary Judgment as to the Remaining Causes of Action

- b. Records of Proceedings Up to Appeal to Circuit Court
  - c. City of Goose Creek Business License Ordinance
  - d. Ordinances of Other Jurisdictions
  - e. Municipal Association of South Carolina Business License Handbook
  - f. Affidavits:
    - 1. Dennis Harmon (with attachments)
    - 2. Ron Faretra (with attachments)
  - g. Deposition excerpts from Todd Old's deposition taken July 6, 2012
  - h. Deposition excerpts from Todd Old's deposition taken August 2, 2012
  - i. Deposition excerpts from Ron Faretra's deposition taken on July 6, 2012
  - j. Deposition excerpts from Steve Price's deposition taken December 20, 2012
  - k. Affidavit of Robert Baldwin
  - l. Letter dated July 10, 2014 from Thomas R. Goldstein, Esquire to Tim Domin, Esquire
  - m. Letter dated July 18, 2014 from Timothy A. Domin, Esquire to Thomas R. Goldstein, Esquire
9. Judge Dennis' Order



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Attorney for Respondent

July 15, 2015

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Todd Olds ..... Appellant,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 15th day of July, 2015, the foregoing Respondent's Designation of Materials to be Included in Record on Appeal was served upon opposing counsel of record by placing a copy of same in the United States Mail, First Class, postage prepaid, addressed as follows:

Thomas R. Goldstein, Esquire  
Belk, Cobb, Infinger & Goldstein, P.A.  
PO Box 71121  
N. Charleston, SC 29415-1121



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Attorney for Respondent

**CLAWSON  
AND  
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Timothy A. Domin  
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July 15, 2015

File No.: 20111160.000

**VIA US MAIL**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211-1629

Re: Todd Olds v. City of Goose Creek  
Appellate Case No.: 2014-002393  
Claim No.: SF110935

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed please find the original and a copy of Respondent's Initial Brief, Respondent's Designation of Materials to be included in the Record on Appeal and Certificates of Service regarding the above-referenced case. After filing, please return the copies to me in the enclosed envelope.

Thank you for your assistance in this matter.

Very truly yours,

CLAWSON and STAUBES, LLC



Timothy A. Domin

TAD/paa  
Enclosures

cc: Thomas R. Goldstein, Esq.  
(Via US Mail & w/enclosures)

CLAWSON  
THE STAUBES  
LLC



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SC Court of Appeals

The Honorable Jenny Abbott  
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