

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

RECEIVED

SEP 17 2015

SC Court of Appeals

Appellate Case No. 2015-001309

County of Charleston, South Carolina.....Appellant,

v.

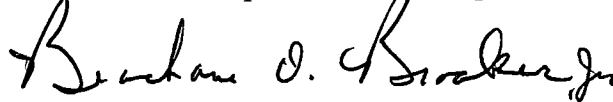
South Carolina Department of Transportation.....Respondent.

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

Respondent has no additions to the matter designated by Appellant.

This designation contains no matter that is irrelevant to this appeal.

South Carolina Department of Transportation



Linda C. McDonald
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Attorneys for Respondent

Columbia, S.C.
September 15, 2015

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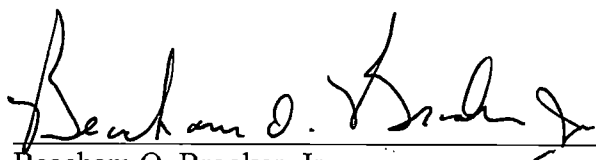
v.

South Carolina Department of TransportationRespondent.

PROOF OF SERVICE

I certify that I have served the INITIAL BRIEF OF RESPONDENT and RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL on Appellant by depositing a copy in the Unites States Mail, postage prepaid, on September 15, 2015, addressed to its attorneys of record as follows:

Joseph Dawson, III, County Attorney
Bernard E. Ferrara, Jr., Deputy County Attorney
Austin A. Bruner, Assistant County Attorney
Johanna S. Gardner, Assistant County Attorney
Charleston County Attorney's Office
Lonnie Hamilton, III Public Services Building
4045 Bridge View Drive
North Charleston, SC 29405



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September 15, 2015



South Carolina
Department of Transportation
Office of Legal Services

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Natalie J. Moore
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Amanda T. Taylor, Claims
Randolph E. Carothers, IV

Claims Office 737-1260

September 15, 2015

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SC Court of Appeals

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

RE: County of Charleston vs. South Carolina Dept. of Transportation
Appellate Case No. 2015-001309

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the INITIAL BRIEF OF RESPONDENT, RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL and PROOF OF SERVICE regarding same in the above captioned matter. Please file the original and return the file marked copies to me using the envelope provided. I have this date served a copy of this pleading on the Appellant by mailing same to the attorneys of record as shown in the Proof of Service.

Sincerely,

Beacham O. Brooker, Jr.
Assistant Chief Counsel

BOB:jmt

Enclosures

cc: Joseph Dawson, III, Esquire
Bernard E. Ferrara, Jr., Esquire
Austin A. Bruner, Esquire
Johanna S. Gardner, Esquire

IVIS

DEPARTMENT OF TRANSPORTATION

BOX 191
COLUMBIA, SC 29202

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SC Court of Appeals

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THE HONORABLE JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
P O BOX 11629
COLUMBIA SC 29211

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