

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

JAN 25 2016

SC Court of Appeals

The Honorable Marvin H. Dukes, III

Appellate Case No. 2015-001813
Lower Case No. 2014-CP-07-1732

Marilyn W. Bunn, a person non compos mentis by and through her guardian, Denise
Suddes, and Margaret Bunn Lochmandy Respondents,

v.

Douglas S. Delaney, as Trustee and in his individual capacity, Alan Wilson, the South
Carolina Attorney General, Sacred Heart-Griffin High School, St. Joseph's Home,
Quincy University, Notre Dame, The Lawrenceville School, All Saints Catholic Church,
and Habitat for Humanity c/o All Saints Catholic Church.....Defendants,

Of Whom Douglas S. Delaney is the..... Appellant.

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

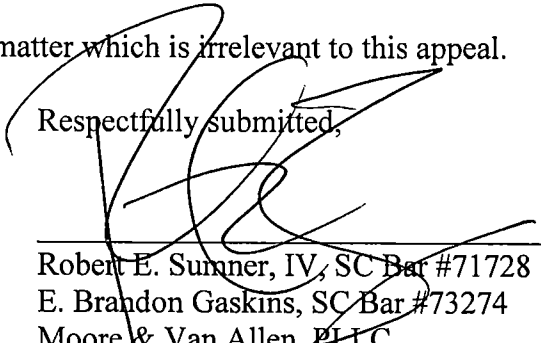
Respondents designate the following to be included in the Record on Appeal:

1. Verified Petition and Motion for Temporary Restraining Order and Injunctive Relief dated Jul 18, 2014.
2. Amended Summons and Complaint dated August 19, 2014.
3. Delaney's Answer to Amended Complaint and Counterclaim dated August 29, 2014.
4. Reply to Counterclaim dated September 25, 2014.

5. Motion for Summary Judgment dated November 3, 2014.
6. Plaintiffs' Memorandum in Support of the Motion for Partial Summary Judgment dated February 5, 2015.
7. Affidavit of Margaret Lochmandy dated February 11, 2015.
8. Defendant Delany's Return to Plaintiffs' Motion for Summary Judgment and Memorandum in Opposition dated March 16, 2015.
9. Affidavit of Douglas Delaney dated March 12, 2015.
10. Transcript of Summary Judgment Hearing dated March 16, 2015.
11. The Honorable Marvin H. Dukes, III's Order Granting Plaintiffs' Motion for Partial Summary Judgment dated April 30, 2015.
12. Defendant Delaney's Motion to Reconsider, Alter and/or Amend dated May 11, 2015.
13. Plaintiffs' Memorandum in Opposition to Motion to Reconsider dated May 27, 2015.
14. Affidavit of Margaret Lochmandy dated July 16, 2015.
15. Form 4 Order of the Honorable Marvin H. Dukes, III dated July 21, 2015 denying Motion to Reconsider.
16. Notice of Appeal dated August 20, 2015.

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

Respectfully submitted,



Robert E. Sumner, IV, SC Bar #71728
E. Brandon Gaskins, SC Bar #73274
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Attorney for Respondents

January 19, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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The Honorable Marvin H. Dukes, III

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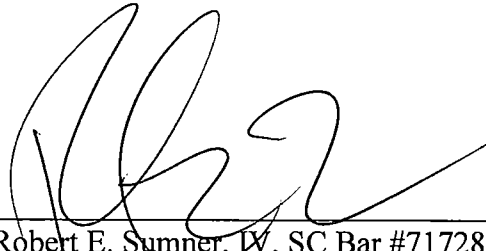
Douglas S. Delaney, as Trustee and in his individual capacity, Alan Wilson, the South Carolina Attorney General, Sacred Heart-Griffin High School, St. Joseph's Home, Quincy University, Notre Dame, The Lawrenceville School, All Saints Catholic Church, and Habitat for Humanity c/o All Saints Catholic Church Defendants,

Of Whom Douglas S. Delaney is the Appellant.

PROOF OF SERVICE

This is to certify that I have this day served counsel for the Appellant in the foregoing matter with a copy of the foregoing *Initial Brief of Respondent*, and *Respondents' Designation of Matter to be Included in the Record on Appeal* by depositing same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

Sean Michael Bolchoz, Esquire
Bolchoz Law Firm, PA
6 Buckingham Plantation Drive, Suite B
Post Office Box 828
Bluffton, South Carolina 29910
(843) 836-3033



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Attorney for Respondents

January 19, 2016
Charleston, South Carolina

Moore & Van Allen

January 19, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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Re: Marilyn W. Bunn, et al., v. Douglas S. Delaney, et al.
Appellate Case No. 2015-001813
MVA File No. 038025.1

Dear Ms. Kitchings:

With regard to the above referenced action, enclosed for filing please find an original and one (1) copy of each of the following:

1. Initial Brief of Respondents;
2. Respondents' Designation of Matter to be Included in the Record on Appeal; and
3. Proof of Service.

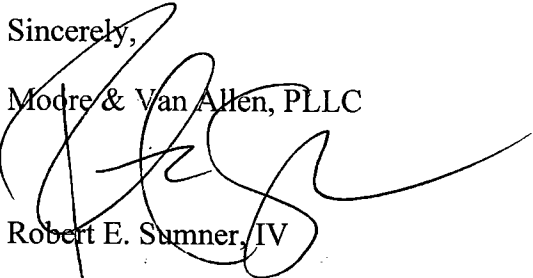
Please file the originals and return a date-stamped copy of each to me in the stamped, self-addressed envelope enclosed.

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

Thank you for your assistance in this matter and please call me with any questions.

Sincerely,

Moore & Van Allen, PLLC

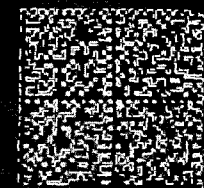

Robert E. Sumner, IV

RES/ws

Enclosures: as stated

cc: Sean Michael Bolchoz, Esquire

Charlotte, NC
Research Triangle Park, NC
Charleston, SC



Letter

U.S. POSTAGE

Moore & Van Allen

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