

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Robert Hood, Circuit Court Judge

RECEIVED

MAR 31 2016

Case No. 2014-CP-40-2209

SC Court of Appeals

James Chaffin and Marietta Chaffin, Appellants,

v.

Richland County Sheriff's Department, Deputy Brian Metz,
Investigator Roy Livingston, Tallie and Devra Lackey,
individually and as the Parents to the minor M.G., Respondents.

**RESPONDENTS RICHLAND COUNTY SHERIFF'S
DEPARTMENT AND BRIAN METZ'S
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**


The Respondents Richland County Sheriff's Department and Brian Metz
propose that the following be included in the Record on Appeal:

1. Complaint filed April 14, 2014

2. Answer of Defendants Richland County Sheriff's Department and Brian Metz, filed May 15, 2014
3. Motion to Dismiss of Defendants Richland County Sheriff's Department and Brian Metz, filed May 15, 2014
4. Order of Judge Robert E. Hood filed September 8, 2014
5. Order of Judge Robert E. Hood filed September 9, 2014
6. Form Order of Judge Robert E. Hood filed July 20, 2015
7. Plaintiffs' Motion to Reconsider filed September 19, 2014
8. Transcript of Motion Hearing, July 21, 2014

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

DAVIDSON & LINDEMANN, P.A.

BY: 

ANDREW F. LINDEMANN
ROBERT D. GARFIELD
1611 Devonshire Drive
Post Office Box 8568
Columbia, South Carolina 29202
(803) 806-8222

*Counsel for Respondents Richland County
Sheriff's Department and Brian Metz*

Columbia, South Carolina

March 28, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY
Robert Hood, Circuit Court Judge

MAR 31 2016
SC Court of Appeals

Case No. 2014-CP-40-2209

James Chaffin and Marietta Chaffin, Appellants,

v.

Richland County Sheriff's Department, Deputy Brian Metz,
Investigator Roy Livingston, Tallie and Devra Lackey,
individually and as the Parents to the minor M.G., Respondents

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondents Richland County Sheriff's Department and Brian Metz, does hereby certify that service of the **Initial Brief of Respondents Richland County Sheriff's Department and Brian Metz and Respondents Richland County Sheriff's Department and Brian Metz' Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 28th day of March 2016:

Aimee J. Zmroczek, Esquire
A.J.Z. Law Firm, LLC
Post Office Box 11961
Columbia, South Carolina 29211

John S. Simmons, Esquire
John L. Warren, III, Esquire
Simmons Law Firm, LLC
1711 Pickens Street
Columbia, South Carolina 29202



DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

William H. Davidson, II
Andrew F. Lindemann*
James M. Davis, Jr.†
Robert D. Garfield
Michael B. Wren

1611 Devonshire Drive, Second Floor
Post Office Box 8568
Columbia, South Carolina 29202-8568
Telephone: (803) 806-8222
Facsimile: (803) 806-8855
www.dml-law.com

Daniel C. Plyler
Joel S. Hughes
David A. DeMasters
Steven R. Spreeuwiers
Todd R. Flippin

*Also Admitted In North Carolina
†Certified Mediator

March 28, 2016

Of Counsel
RECEIVED
Kenneth P. Woodington
Writer's Email: alindemann@dml-law.com
MAR 31 2016
SC Court of Appeals

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

RE: James Chaffin and Marietta Chaffin v. Richland County Sheriffs Department, Deputy Brian Metz, Investigator Roy Livingston, Tallie and Devra Lackey, Individually and as the parents to minor M.G.
Appellate Case Number: 2015-001754
Civil Action Number: 2014-CP-40-2209
Our File Number: 314.9428

Dear Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the **Initial Brief of Respondents Richland County Sheriff's Department and Brian Metz and Respondents Richland County Sheriff's Department and Brian Metz' Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me in the enclosed envelope.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
March 28, 2016
Page Two

cc: (w/ Enclosures)

Aimee J. Zmroczek, Esquire
A.J.Z. Law Firm, LLC
Post Office Box 11961
Columbia, South Carolina 29211

John S. Simmons, Esquire
John L. Warren, III, Esquire
Simmons Law Firm, LLC
1711 Pickens Street
Columbia, South Carolina 29202