

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM NEWBERRY COUNTY  
DECISION OF NEWBERRY COUNTY COUNCIL  
Appellate Case Number 2016-000305

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Arthur L. Jayroe Jr.,

Appellant,

Vs.

Newberry County,

Respondent.

**RECEIVED**

APR 21 2016

SC Court of Appeals

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**APPELLANT'S DESIGNATIONS**

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Pursuant to Rule 209, SCACR, Appellant Arthur Jayroe Jr. proposes the following be included in the Record on Appeal. Unless otherwise stated, all items designated include exhibits and exclude proof of service, cover sheets, motion forms, and notices. Appellant reserves the right to include additional designations in connection with its initial reply brief or otherwise.

**ORDERS**

1. Decision of County Council issued February 3, 2016

**PLEADINGS**

2. Petition for Redress dated March 11, 2015.
3. Response to Petition for Redress dated April 13, 2015.

4. Respondent's Responses to Petitioner's Requests to Admit dated August 27, 2015
5. Amended Affidavit of Attorney Fees dated December 16, 2015.


**TRANSCRIPT OF HEARING**  
**October 27, 2015**

6. Pg. 14, line 13 – p. 76, line 10
7. Pg. 109, line 1 – p. 112, line 23
8. Pg. 121, line 15 – p. 122, line 2
9. Pg. 127, lines 16-18
10. Pg. 130, lines 9 – 23
11. Pg. 132, line 8 - p. 133, line 1
12. Pg. 136, line 18 – p. 137, line 3
13. Pg. 139, line 22 – p. 143, line 21
14. Pg. 155, line 11 – p. 163, line 15
15. Pg. 166, line 21 – p. 171, line 6.

**EXHIBITS**

16. Petitioner (Appellant)'s Trial Exhibits 1 through 28 (Exhibit 17 pages 3-7)
  17. Respondent (Newberry County)'s Trial Exhibits 1, 8, 9, 12, 15
- I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,



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Harvey M. Watson III

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Attorneys for Appellant

April 20, 2016

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Arthur L. Jayroe Jr.,

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**CERTIFICATE OF SERVICE**

I, Beth Cogan, an employee with Ballard & Watson, Attorneys at Law, do hereby certify that on April 20, 2016, I served a copy of the **Appellant's Initial Brief** and **Appellant's Designation of Matter** in the above-captioned case on the following individuals by standard US Mail:

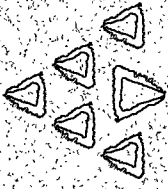
**Sarah P. Spruill, Esquire  
Haynsworth Sinkler Boyd, P.A.  
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Columbia, South Carolina 29201**

Beth Cogan

Beth Cogan, Paralegal

April 20, 2016  
West Columbia, South Carolina



**Ballard & Watson**  
Attorneys at Law  
PERSISTENT. UNWAVERING.

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April 20, 2016

Via U.S. Mail

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

Re: *Arthur Jayroe, Jr. v. Newberry County*  
Appellate Case No: 2016-000305

Dear Ms. Kitchings:

Please find enclosed for filing an original and one (1) copy of the **Appellant's Initial Brief** in the above-referenced matter. Also enclosed are an original and one copy of **Appellant's Designation of Matter** pursuant to Rule 209, SCACR. After both have been filed, please return the clocked copies to our office in the enclosed, self-addressed, stamped envelope.

Please do not hesitate to contact our office if you should have any questions. With warm personal regards, I am,

Sincerely yours,

*Desa Ballard by Hand*

Desa Ballard  
[desab@desaballard.com](mailto:desab@desaballard.com)

cc: Via U.S. Mail

Sarah Spruill, Esquire  
Steve Matthews, Esquire  
Art Jayroe (via email)

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