

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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APPEAL FROM GEORGETOWN COUNTY  
COURT OF COMMON PLEAS

THE HONORABLE BENJAMIN H. CULBERTSON  
CIRCUIT COURT JUDGE

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APPELLATE CASE NO. 2016-000251  
CIVIL ACTION NO. 2009-CP-22-0325

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**RECEIVED**  
AUG 22 2016  
SC Court of Appeals

Willie Singleton and Julia Thomas, Heirs at Law  
of Victoria Gadson, deceased,

**PLAINTIFFS,**

versus

City of Georgetown Building Official Stephen Stack, Mayor  
Lynn Wood Wilson, Mayor Pro Temp Brendon M. Barber, Sr.,  
Council Member Peggy P. Wayne, Council Member Clarence Smalls,  
Council Member Paige B. Sawyer, III, Council Member Rudolph A.  
Bradley, Council Member Jack Scoville, Director of Building Planning  
Sabrina Morris, Steve Thomas, City Administrator, and  
The City of Georgetown;

**DEFENDANTS,**

Of whom Willie Singleton is the

**APPELLANT/RESPONDENT,**

and

The City of Georgetown is the

**RESPONDENT/APPELLANT.**

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

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The City of Georgetown, Respondent/Appellant, in the above referenced matter, proposes the following be included in the Record on Appeal:

1. Complaint, filed March 6, 2009;
2. Answer, filed April 2, 2009;
3. Motion to Dismiss Individual Defendants;
4. Motion to Strike Punitive Damages;
5. Order Granting Motions to Dismiss, dated August 4, 2009;
6. The City's Memorandum in Support of its Motion for Summary Judgment, dated April 17, 2015 with exhibits (Singleton Deposition Excerpt; Thomas Deed to Singleton; and Power of Attorney);
7. Form 4 Order denying motion for summary judgment, filed April 23, 2015;
8. The City's Motion *In Limine*, dated January 8, 2016;
9. Motion to Recuse Judge, filed January 8, 2016;
10. Transcript of Trial Held January 11-14, 2016;
11. Jury's Verdict, filed January 19, 2016;
12. Order Entering Judgment, filed January 19, 2016;
13. Post-Trial Motions of the City, filed January 27, 2016;
14. Order Denying Post-Trial Motions, filed February 26, 2016;
15. Photos of House (Defendant's Exhibits 1-40);
16. First Notice (Plaintiff Ex. 2);
17. Second Notice (Plaintiff Ex. 3);
18. Final Notice (Plaintiff Ex. 5);
19. March 20, 2007 Letter from City (Plaintiff Ex.11);
20. Petition for Probate of Will (Defendant Ex. 41);

21. Deed of Distribution (Plaintiff Ex. 17);
22. Power of Attorney (Defendant Ex. 53); and
23. November 30, 2007 Thomas Deed (Plaintiff Ex. 18).

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

Respectfully submitted,



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Carmen V. Ganjehsani  
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1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400

**ATTORNEYS FOR  
RESPONDENT/APPELLANT  
THE CITY OF GEORGETOWN**

August 19, 2016.

**CERTIFICATE OF SERVICE**

I, the undersigned, attorney for Respondent/Appellant, The City of Georgetown, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated August 19, 2016, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Bonnie Travaglio Hunt  
Hunt Law, LLC  
PO Box 1845  
Goose Creek, SC 29445  
**ATTORNEY FOR APPELLANT/RESPONDENT**



---

Carmen V. Ganjehsani  
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**ATTORNEYS FOR  
RESPONDENT/APPELLANT  
THE CITY OF GEORGETOWN**

Dated: August 19, 2016.

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AUG 22 2016

SC Court of Appeals

Reply to: Carmen V. Ganjehsani  
Direct Dial: 803-253-8692  
cganjehsani@richardsonplowden.com

August 19, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: *Willie Singleton v. The City of Georgetown*  
Appellate Case No. 2016-000251  
Case No.: 2009-CP-220325  
RPR File No.: 2047-223

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Dear Ms. Kitchings:

Enclosed for filing are the original Initial Appellant's Brief of Respondent/Appellant the City of Georgetown, the Initial Respondent's Brief of Respondent/Appellant the City of Georgetown, and our Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our original Certificates of Service.

By copy of this letter, we are this day serving a copy of these Initial Briefs and the Designation of Matter on counsel for the Appellant/Respondent.

If you should have any questions, please do not hesitate to contact me.

Sincerely,

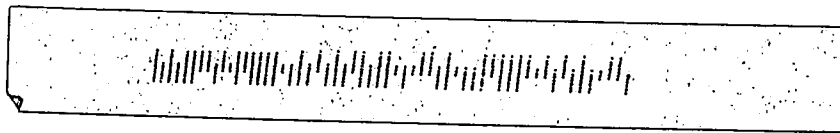


Carmen V. Ganjehsani

CVG  
Encs.

cc: Bonnie Travaglio Hunt, Esquire (w/encs.)  
Douglas C. Baxter (via e-mail)

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2047-223

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The Honorable Jenny Abbott Kitchings  
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