

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

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Case No.: 2016-000650

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**RECEIVED**  
SEP 02 2016  
SC Court of Appeals

Terrell L McCoy, 256070, ..... Appellant

v.

North Charleston Police Department and  
Sgt. Thomas Deckard, of which, North  
Charleston Police Department is, ..... Respondent

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

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Respondent, North Charleston Police Department, hereby designates the following  
to be included in the Record on Appeal in the above referenced matter:

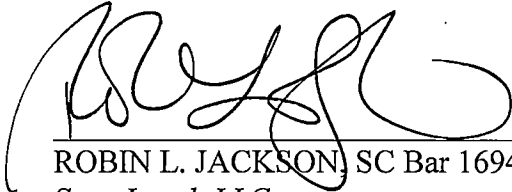
1. Summons and Complaint
2. Defendants' Motion to Dismiss
3. Transcript of Proceedings - May 7, 2015
4. Pages of Transcript of Second Trial - Pgs. 631-636
5. FOIA Complaint - November 22, 2013

6. Order granting Defendants' Motion to Dismiss - filed May 14, 2015
7. Transcript of Proceedings on Motion to Reconsider - December 2, 2015
8. Order denying Motion to Reconsider - filed March 2, 2016

Respondent hereby objects to the inclusion of the following items, previously designated by the appellant in his designations, as they are irrelevant to the issues involved in this matter:

- #3 - Second Interrogatories - as they relate to another case
- #8 - First Interrogatories - as they relate to another case
- #9 - Request of Admission - as they relate to another case

I certify, as counsel for Respondents, that this designation contains no matter which is irrelevant to this appeal.



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ROBIN L. JACKSON, SC Bar 16948  
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August 31, 2016

Attorney for Respondent

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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Case No.: 2016-000650

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Terrell L McCoy, ..... Appellant

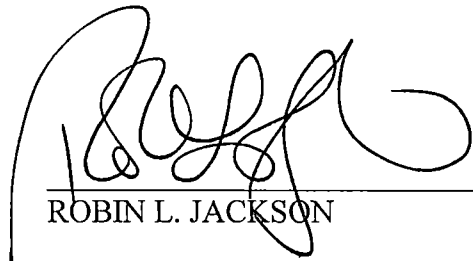
v.

North Charleston Police Department and  
Sgt. Thomas Deckard, of which, North  
Charleston Police Department is, ..... Respondent

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of Respondent's Initial Brief and Designation of Matter has been served upon the pro se appellant by mailing a copy properly addressed with sufficient postage affixed thereto this 31<sup>st</sup> day of August, 2016, to the following:

Inmate Terrell L McCoy  
Broad River Correctional Institution  
Marion #149  
4460 Broad River Road  
Columbia, SC 29210

  
ROBIN L. JACKSON



*Senn Legal*  
-LLC-  
ATTORNEYS AT LAW

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[Robin@sennlegal.com](mailto:Robin@sennlegal.com)

August 31, 2016

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

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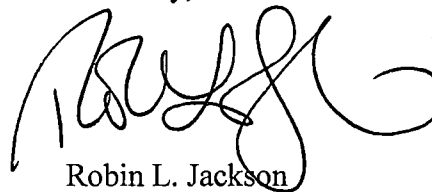
RE: McCoy v. North Charleston Police Department et al.  
Case No.: 14-CP-10-7706  
IRF Claim No.:

Dear Madam Clerk:

Please find enclosed the original and one (1) copy of Respondents' Initial Brief, Designation of Matter and certificate of service in the above referenced matter. Please file the original and return the file stamped copy to me in the enclosed self addressed stamped envelope. By copy of this letter, I am serving the *pro se* appellant with a copy of this brief.

With kind regards, I am,

Sincerely,

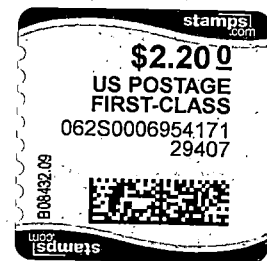


Robin L. Jackson

RLJ/mos  
Enclosure

cc: Inmate Terrell McCoy

KODIN L. JACKSON, Esquire  
*Senn Legal, LLC*  
P.O. Box 12279  
Charleston, SC 29412



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SEP 02 2016

SC Court of Appeals

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

