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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
The Honorable Marvin H. Dukes, III

Trial Court Case No.: 2012-CP-07-01394, 2010-CP-07-04844
2008-CP-07-01114
Appellate Case No.: 2016-000687

Grays Hill Baptist Church, Respondent
v.
Beaufort County and The Beaufort County Zoning Board of Appeals, Defendants,
And
The United States of America, Defendant-Intervenor,
Of Which Beaufort County and The United States of America are Appellants.

DESIGNATION OF MATTER TO BE INCLUDED
IN RECORD ON APPEAL

The Respondent, Grays Hill Baptist Church, proposes the following to be included in the Record on appeal:

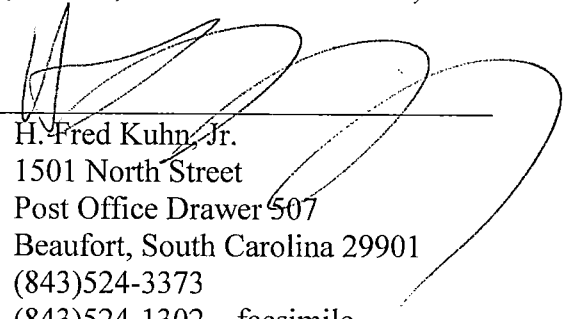
1. Transcript of the hearing held before the Beaufort County Planning Commission, together with all Exhibits;
2. The Development Permit and accompanying Development Plat;
3. Each of the documents attached as Exhibits to the Final Order of Judgment.

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

Respectfully submitted,

MOSS, KUHN, FLEMING & SMITH, P.A.

By: _____



H. Fred Kuhn, Jr.
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Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302 – facsimile

Beaufort, South Carolina
September 8, 2016

Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
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Defendants,

And

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Defendant-Intervenor,

Of Which Beaufort County and The United States of America are

Appellants.


CERTIFICATE OF SERVICE

Undersigned certifies that the Designation of Matter to be Included in Record on Appeal to which this certificate is affixed, was served upon the party(s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Mary Bass Lohr, Esquire
Howell, Gibson & Hughes, P.A.
Post Office Box 40
Beaufort, South Carolina 29901

Lee E. Berlinsky
Assistant United States Attorney
151 Meeting Street, Suite 200
Charleston, South Carolina 29401

in a post office or official depository under the exclusive care and custody of the United States
Postal Service, on September 8, 2016.

By: 

Sue Radford
Secretary for H. Fred Kuhn, Jr.

LAW OFFICES

MOSS, KUHN, FLEMING & SMITH, P.A.

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September 8, 2016

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

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RE: Grays Hill Baptist Church v. Beaufort County
Case Nos: 2012-CP-07-01394, 2010-CP-07-04844 and 2008-CP-07-0-1114
Appellate Case No.: 2016-000687

Dear Mrs. Kitchings:

Enclosed please find the original and one (1) copy of the Respondent's Initial Brief Responding to Appellant Beaufort County, Respondent's Initial Brief Responding to Appellant United States of America and Designation of Matter to be Included in Record on Appeal regarding the above-referenced matter. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of the same on all counsel of record.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.

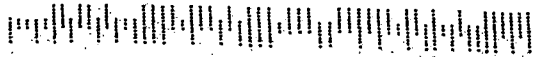


H. Fred Kuhn, Jr.

HFKjr:sr

Enclosures

cc: Mary Bass Lohr, Esquire (w/enclosures)
Lee E. Berlinsky, Esquire (w/enclosures)



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GHBC

To:

Honorable Jenny Abbott Kitchings
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