

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

DEC 14 2016

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable Jean Toal, Circuit Court Judge

Case No: 2016-002018

Fred S. Davis.....Appellant

v.

Mark Keel, Director of the South Carolina Law Enforcement Division (SLED) and the State of
South CarolinaRespondent

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

1. Summons and Complaint for Declaratory Judgment;
2. Answer of Respondents;
4. Respondents'/Defendants' Motion for Judgment on the Pleadings;
5. Respondents'/Defendants' Memorandum in Support of Summary Judgment;
6. Appellant's/Petitioner's Return to Motion of Respondent(s)/Defendants;

7. Affidavit of Dr. Thomas V. Martin, M.D.
8. Transcript of Record of Hearing on September 7, 2016, before the Honorable Jean Toal,
and
9. Order Granting Judgment on the Pleadings dated September 9, 2016.

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



Charles T. Brooks, III, SC Bar # 11762
Attorney for Appellant
THE BROOKS LAW OFFICE, LLC
309 Broad Street
Post Office Box 3512
Sumter, South Carolina 29151
803-418-5708
803-934-9618
cbrooks@ctbrooks.com

December 7, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

DEC 14 2016

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable Jean Toal, Circuit Court Judge

Case No: 2016-002018

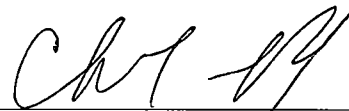
Fred S. Davis.....Appellant

v.

Mark Keel, Director of the South Carolina Law Enforcement Division (SLED) and the State of
South CarolinaRespondents

CERTIFICATE OF COUNSEL

The undersigned certified that this Initial Brief and Designation complies with
Rule 208 and Rule 228, SCRAP.



Charles T. Brooks, III, S.C. Bar # 11762
Attorney for Appellant/Plaintiff
THE BROOKS LAW OFFICE, LLC
309 Broad Street
Post Office Box 3512
Sumter, South Carolina 29151
803-418-5708
803-934-9618 [Facsimile]
brooksirbrooks@aol.com

December 7, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable Jean Toal, Circuit Court Judge

Case No: 2016-002018

RECEIVED

DEC 14 2016

SC Court of Appeals

Fred S. Davis.....Appellant

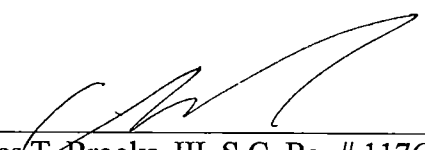
v.

Mark Keel, Director of the South Carolina Law Enforcement Division (SLED) and the
State of South CarolinaRespondent

PROOF OF SERVICE

I do hereby certify that I have this ___ day of December 2016, served a copy of the **MOTION TO FILE AND SERVE APPELLANT'S INITIAL BRIEF OUT OF TIME AND INITIAL BRIEF OF APPELLANT** and a **PROOF OF SERVICE**, on Mark Keel, Director of the South Carolina Law Enforcement Division (SLED) by personally depositing a copy of it in the United States Mail, postage prepaid, on November 15, 2016, addressed to his attorney of record, Adam L. Whitsett, Post Office Box 21398, Columbia, South Carolina 29221-1398 and on The State of South Carolina by personally depositing a copy of it in the United States Mail, postage prepaid, on September 20, 2016, addressed to their attorney of record, T. Parkin C. Hunter, Office of South Carolina Attorney General, Post Office Box 11549, Columbia, South Carolina 29211

Dated: 12/12/16


Charles T. Brooks, III, S.C. Bar # 11762
Attorney for Appellant
309 Broad Street
Post Office Box 3512
Sumter, South Carolina 29151
803-418-5708
803-934-9618 [Facsimile]
cbrooks@ctbrooks.com

The Brooks Law Office, LLC

CHARLES T. BROOKS, III, ATTORNEY AT LAW

IRMA R. BROOKS, ATTORNEY AT LAW

309 BROAD STREET ~ SUMTER, SOUTH CAROLINA 29150
POST OFFICE BOX 3512 ~ SUMTER, SOUTH CAROLINA 29151
(803) 418-5708

FAX: (803) 934-9618 TOLL FREE: (877) 770-8792

Email: cbrooks@ctbrooks.com

December 12, 2016

RECEIVED

DEC 14 2016

SC Court of Appeals

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

RE: Davis vs. Mark Keel, Chief of the South Carolina Law Enforcement Division, et al
2016-CP-40-00751

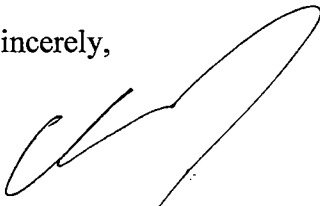
To Whom It May Concern:

Enclosed herewith please find the Motion to File and Serve Appellant's Initial Brief Out of Time as well as the Initial Brief of Appellant for Fred S. Davis and Proof of Service in the above titled matter.

If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,



Charles T. Brooks, III
CTB,III/jlm

Enclosures as stated

cc: Office of SC Attorney General
ATTN: T. Parkin C. Hunter
Post Office Box 11549
Columbia, South Carolina 29211

SLED
Adam L. Whitsett, Esq.
Post Office Box 21398
Columbia, South Carolina 29221