

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

---

Appellate Case No. 2014-002532  
Case No. 2013-CP-36-00321

---

Anthony Derone Richardson,

Appellant,

v.

Jackie Swindler, Chief of Police,  
Newberry County Municipal Police,

Respondent.

**RECEIVED**  
JAN 03 2017  
SC Court of Appeals

---

**RESPONDENT'S RESPONSE TO APPELLANT'S MOTION TO LIMIT PAGES AND  
LENGTH TO RECORD ON APPEAL**

---

The Respondent, Jackie Swindler, through his undersigned attorneys, hereby responds to the Appellant's Motion to Limit Pages and Length to Record on Appeal. The exact objective of the Appellant's Motion is unclear. However, the Respondent objects to the Appellant's request to limit the pages and length of the Record on Appeal if the Appellant is seeking to circumvent the requirements set forth in Rule 210(a), SCACR, which provides that "[t]he Record on Appeal shall include all matter designated to be included by any party under Rule 209 and shall comply with the requirements of Rule 207." Id.

The Respondent recently filed his Fourth Motion to Correct the Record on Appeal, which the Court granted. The ground for the Respondent's Motion was to require the Appellant to prepare a complete Record on Appeal including all items contained in the Respondent's Designation of Matter to be Included in the Record on Appeal. It is crucial that all matters listed in the Respondent's Designation of Matter be included in the Record on Appeal. Otherwise, it will be impossible to cite to those pages in the Final Brief. Rule 210(h) clearly states that: "[e]xcept as provided by Rule 212 and Rule 208(b)(1)(C) and (2), the appellate court will not consider any fact which does not appear in the Record on Appeal." Rule 210(h), SCACR. The documents listed in the Respondent's Designation of Matter, which the Appellant continues to omit from the Record on Appeal, are central to the issues on appeal and contain facts that require consideration by the Court in this matter. Accordingly, to the extent the goal of the Appellant's Motion is to avoid complete compliance with Rule 210(a), SCACR, the Respondent objects to the Appellant's Motion and respectfully requests that it be denied.

Respectfully submitted by,

MORRISON LAW FIRM, LLC

By: Kassi Sandifer

David L. Morrison

Kassi B. Sandifer

Robert G. Cooper

7453 Irmo Drive, Suite B

Columbia, South Carolina 29212

Phone: (803) 661-6285

Fax: (803) 661-6289

E-mail: david@dmorrison-law.com

E-mail: kassi@dmorrison-law.com

ATTORNEYS FOR THE RESPONDENT

Columbia, South Carolina  
December 30, 2016

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Appellate Case No. 2014-002532  
Case No. 2013-CP-36-00321

Anthony Derone Richardson,

Appellant,

v.

Jackie Swindler, Chief of Police,  
Newberry County Municipal Police,

Respondent.

**RECEIVED**

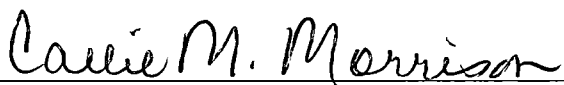
JAN 03 2017

**SC Court of Appeals**

CERTIFICATE OF SERVICE

The undersigned employee of Morrison Law Firm, LLC, attorney for the Respondent does hereby certify that service of the **Respondent's Response to Appellant's Motion to Limit Pages and Length to Record on Appeal** in the above-captioned action was made upon the Appellate by placing same in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 30th day of December, 2016, addressed as follows:

Anthony D. Richardson  
Post Office Box 221  
Newberry, South Carolina 29108

  
Callie M. Morrison

Columbia, South Carolina

**Morrison Law Firm, LLC**

7453 Irmo Drive, Suite B  
Columbia, South Carolina 29212  
Phone: (803) 661-6285  
Fax: (803) 661-6289  
E-mail: David@dmorrison-law.com  
E-mail: Kassi@dmorrison-law.com  
E-mail: Bob@dmorrison-law.com  
E-mail: Jordon@dmorrison-law.com

David L. Morrison\*  
Kassi B. Sandifer  
Robert G. Cooper\*\*  
J. Jordon Johnson

\*Licensed in SC & NC  
\*Certified Mediator  
\*\*Of Counsel

December 30, 2016

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

RE: Anthony Derone Richardson v. Jackie Swindler, Chief of Police, Newberry County  
Municipal Police  
Appellate Case #: 2014-002532  
C/A #: 13-CP-36-00321  
Our file: 210.0411

**RECEIVED**  
JAN 03 2017  
SC Court of Appeals

Dear Clerk Kitchings:

Enclosed are the original and one copy of the Respondent's Response to Appellant's Motion to Limit Pages and Length to Record on Appeal in this matter. Please return a clocked-in copy to me in the self-addressed stamped envelope enclosed for your convenience. By copy of this letter, I am serving the Appellant with a copy of same.

Very truly yours,

MORRISON LAW FIRM, LLC



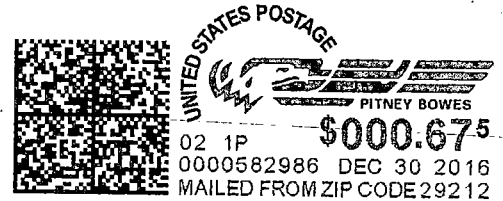
Kassi B. Sandifer

Enclosure

cc: Anthony D. Richardson

MORRISON LAW FIRM, LLC  
7453 Irmo Drive, Suite B  
Columbia, South Carolina 29212

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



**RECEIVED**  
JAN 03 2017  
SC Court of Appeals