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JAN 24 2017

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHESTERFIELD COUNTY  
Court of Common Pleas

Roger E. Henderson, Circuit Court Judge

Appellate Case No:

Carroll Freeman and Brooke Freeman,

Appellants,

v.

South Carolina Department of Transportation,  
and County of Chesterfield, South Carolina

Respondents.

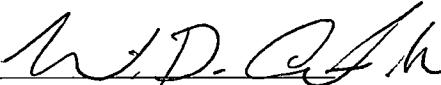
**DESIGNATION OF MATTERS TO BE  
INCLUDED IN THE RECORD ON APPEAL**

1. Transcript of Record May 23, 2016
2. Summons and Complaint
3. Copy of Certified Letter March 10, 2015
4. Acceptance of Service
5. County Answer
6. SCDOT Answer
7. Reply to County Answer
8. Reply to SCDOT Answer
9. County Motion for Summary Judgment
10. SCDOT Motion for Summary Judgment

11. SCDOT Memorandum in Support of Summary Judgment
12. Affidavit of Kenton Harold Wagner
13. Affidavit of Tim Eubanks
14. Affidavit of Melissa Eason Roscoe
15. Order Summary Judgment

Respectfully Submitted,

COCKRELL LAW FIRM

By: 

William D. Curtis, Jr., SC BAR# 101163

with express permission by Attorneys for Appellants

M.W.Cockrell, III, SC BAR # 69417

Sarah C. Campbell, SC BAR # 100581

BARRISTER BUILDING

159 Main Street

Chesterfield, South Carolina

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January 20, 2017  
Chesterfield, South Carolina

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South Carolina Department of Transportation,  
and County of Chesterfield, South Carolina

Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Designation of Matters to Be Included in the Record on Appeal by depositing a copy of the same in the United States Mail, postage prepaid, on January 20, 2017, addressed to the follow attorneys of record:

David L. Morrison, Esquire  
Kassi B. Sandifer, Esquire  
Morrison Law Firm, LLC  
7453 Irmo Drive Suite B  
Columbia, South Carolina 29212

Samuel F. Arthur, III, Esquire  
J. Rufus Bratton, III, Esquire  
Aiken, Bridges, Elliot, Tyler & Saleeby, P.A.  
Post Office Drawer 1931  
Florence, South Carolina 29503

JANUARY 20, 2017

COCKRELL LAW FIRM

By: W.D. Curtis, Jr.

William D. Curtis, Jr. SC BAR# 101163

with express permission by Attorneys for Appellants

M.W.Cockrell, III, SC BAR # 69417

Sarah C. Campbell, SC BAR # 100581

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January 20, 2017  
Chesterfield, South Carolina



M.W. Cockrell, III (SC)  
Sarah C. Campbell (SC)  
M.W. Cockrell, Jr. (TX)\*+

*\*of counsel*  
*+ Board Certified: Oil, Gas & Mineral Law*  
*Texas Board of Legal Specialization*

**COCKRELL**  
LAW FIRM, P.C.

January 20, 2017

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

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JAN 24 2017

**SC Court of Appeals**

Re: Caroll Freeman and Brooke Freeman vs. South Carolina Department of  
Transportation and County of Chesterfield, South Carolina  
Case No: 2015-CP-13-118  
Appellate Case No: 2016-001865

Dear Madam Clerk:

I hope this letter finds you well. Enclosed herewith, please find the original and one (1) copy of Appellant's Initial Brief, Designation of Matters to Be Included in the Record on Appeal and Proofs of Service of the same. Please files the originals and return the clocked copy to my office in the enclosed self-addressed, stamped envelope I have provided for your convenience.

If you have any questions or concerns, please do not hesitate to contact my office.

With Highest Regards, I remain

Sincerely,

M.W. Cockrell, III  
MWC/WC  
Enclosure(s)

CC: David L. Morrison, Esquire  
Kassi B. Sandifer, Esquire

Samuel F. Arthur, III, Esquire  
J. Rufus Bratton, III, Esquire



**COCKRELL**  
LAW FIRM, P.C.

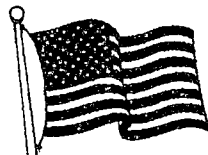
Olde Towne Centre  
Barrister Building  
159 Main Street  
Chesterfield, South Carolina 29709

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
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