

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

**RECEIVED**

L Casey Manning, Circuit Court Judge

**APR 11 2017**

Case No. 2017-CP-40-000617

**SC Court of Appeals**

South Carolina Public Interest Foundation and William B. DePass, Jr., individually, and on behalf of all others similarly situated, ..... Appellant,

v.

The city of Columbia, Richland County, and Fairfield County, ..... Respondents.

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

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Appellants designate the following be included in the Record on Appeal:

1. Form 4 Judgment and Order filed February 15, 2017.
2. Summons and Complaint filed February 16, 2016.
3. Answer and Counterclaims of the City of Columbia served March 23, 2016.
4. Richland County's Motion to Dismiss served March 24, 2016.
5. City of Columbia Motion to Dismiss served April 12, 2016.
6. Plaintiff's Reply to Counterclaims of the City of Columbia.
7. Amended Complaint with Exhibits.
8. City of Columbia's Motion For Summary Judgment Filed on or about May 11, 2016
9. Motion to Dismiss filed by Richland County and Fairfield County on or about May 13, 2016.
10. Richland County's Answer to Amended Complaint served May 16, 2016.
11. Four Affidavits from the City of Columbia served on or about June 9, 2016.

12. City of Columbia's Supplemental Memorandum of Law served on or about June 23, 2016.
13. Plaintiffs' Memorandum of Law served on or about June 23, 2016.
14. Rule 56(f) affidavit of Carpenter dated June 29, 2016.
15. Plaintiffs' Motion for Summary Judgment and Memorandum of Law served on or about September 19, 2016
16. Motion for Summary Judgment and Memorandum of Law served by Richland County and Fairfield County on or about September 20, 2016.
17. Richland County's and Fairfield County's Opposition to Plaintiffs' Motion for Summary Judgment served on or about October 4, 2016.
18. City of Columbia's Response to Plaintiff's Memorandum of Law in Support of Motion for Summary Judgment served on or about October 4, 2016.
19. Plaintiffs' Reply Memorandum of Law in Support of Motion for Summary Judgment served on or about October 11, 2016.
20. Richland County's and Fairfield County's Surreply to Plaintiffs' Reply Memorandum served on or about October 18, 2016.

**CERTIFICATE OF COUNSEL**

Pursuant to Appellate Rule 209(c), the undersigned hereby certifies that this Designation of Matter to be Included in the Record on Appeal contains no matter which is irrelevant to the appeal.

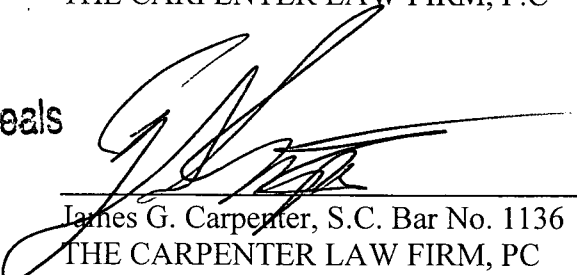
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THE CARPENTER LAW FIRM, P.C

APR 11 2017

SC Court of Appeals

April 6, 2017

  
James G. Carpenter, S.C. Bar No. 1136  
THE CARPENTER LAW FIRM, PC  
819 E. North Street  
Greenville, South Carolina 29601  
(864) 235-1269  
Attorneys for Appellants

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he served a copy of the foregoing Appellants' Initial Brief and Designation of Matter to Be Included in the Record on Appeal on opposing counsel by first class mail, postage prepaid, this April 7, 2017, addressed as follows:

Burnet R. Maybank III  
Post Office Drawer 2426  
Columbia, SC 29202

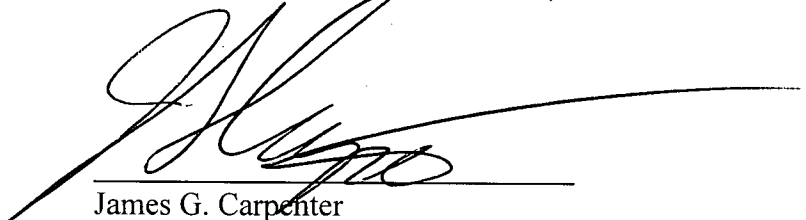
Ray N. Stevens  
PO Box 1509  
Columbia, SC 29202

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APR 11 2017

SC Court of Appeals

Respectfully submitted,  
**THE CARPENTER LAW FIRM, PC**



James G. Carpenter  
S.C. Bar No. 1136  
819 East North Street  
Greenville, SC 29601  
(864) 235-1269  
Attorney for the Plaintiffs

April 7, 2017



WHEN IT'S WORTH FIGHTING FOR

JAMES G. CARPENTER  
james.carpenter@carpenterlawfirm.net  
SERVING S.C. AND N.C.

April 7, 2017

The Honorable Jenny Abbott Kitchings  
Clerk of SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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APR 11 2017

SC Court of Appeals

Re: *South Carolina Public Interest Foundation et al. vs. The City of Columbia, et al*  
Case No. 2017-CP-40-00617

Dear Ms. Kitchings:

I enclose an original and one copy of the Appellants' Initial Brief, Designation of Matters to Be Included in the Record on Appeal, and Certificate of Service in this matter. Please file-stamp the extra copy and return it to me in the enclosed postage paid envelope.

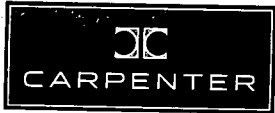
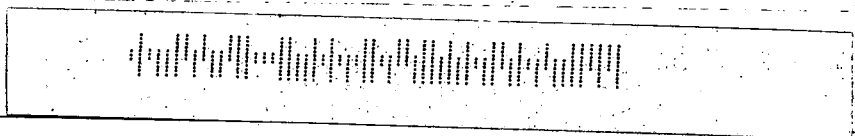
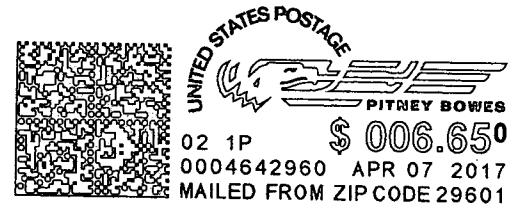
Thank you very much. If you need anything else, please telephone me.

Sincerely yours,  
THE CARPENTER LAW FIRM, PC

James G. Carpenter

Enclosures

CC w/ enclosures: Ray N. Stevens  
Burnet R. Maybank III



THE CARPENTER LAW FIRM, P.C.  
819 EAST NORTH STREET GREENVILLE, SC 29601

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