

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

**RECEIVED**

Carmen T. Mullen, Circuit Court Judge **DEC 06 2017**  
Case No. 2013-CP-07-01341

**SC Court of Appeals**

Appeal Case No. 2017-001736

Road, LLC and Pinckney Point, LLC,

of whom Road, LLC is the

Appellant

v.

Beaufort County, a political subdivision of the State of South Carolina,

Respondent.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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Appellant designates the following to be included in the Record on Appeal:

1. Order of July 18, 2017
2. Form 4 Order of August 12, 2015
3. Form 4 Order of July 7, 2015
4. Order of January 31, 2014
5. Voluntary Dismissal dated July 31, 2013
6. Complaint
7. Answer
8. Amended Summons and Complaint
9. Answer to Amended Complaint
10. Motion to Dismiss dated September 25, 2013
11. County Memorandum in Support of Motion to Dismiss dated January 24, 2014
12. County Motion for Summary Judgment dated August 27, 2014
13. County Amended Motion for Summary Judgment dated June 3, 2015

14. County Motion to Reconsider dated July 17, 2015
15. County Motion JNOV dated May 12, 2016
16. Plaintiff's Memorandum Opposition Motion JNOV dated May 26, 2016
17. County's Proposed Order Granting JNOV
18. Signed Verdicts May 2, 2016
19. Transcript of Proceedings April 25, 26, 27, 28, 29, May 2, 2016 (pp. 1-1265)
20. Plaintiffs' Exhibits 3, 4, 7, 8, 9, 10, 11, 14, 23, 26, 28, 32, 36, 38, 46, 52, 53, 54, 55, 61, 65, 68, 74, 75, 76, 78, 79, 80, 81, 82, 84, 87, 88, 89, 91, 94, 97, 104, 105, 107, 109, 111, 112, 113, 114, and 115
21. Defendant's Exhibits 1, 2, 3, 5, 6, 7, 9, 10, 12, 15, 16, 23, and 27
22. Court's Exhibits 5 and 6

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



G. Trenholm Walker (SC # 5777)  
John P. Linton, Jr. (SC Bar # 79130)  
Walker Gressette Freeman  
& Linton, LLC  
P.O. Box 22167  
Charleston, SC 29413  
(843) 727-2200  
Attorneys for Appellant,  
Road, LLC

December 4, 2017  
Charleston, S.C.

THE STATE OF SOUTH CAROLINA  
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v.

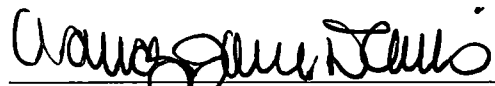
Beaufort County, a political subdivision of the State of South  
Carolina, ..... Respondent.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I certify that I have served the **APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**, on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on December 4, 2017, addressed to its attorneys of record as follows:

C. Mitchell Brown  
Nelson Mullins Riley & Scarborough, LLP  
P.O. Box 11070  
Columbia, SC 29211

Robert W. Achurch, III  
Mary Bass Lohr  
Howell Gibson & Hughes, P.A.  
P.O. Box 40  
Beaufort, SC, 29901

  
\_\_\_\_\_  
Nancy Jane Dennis, Paralegal



G. Trenholm Walker  
Thomas P. Gressette, Jr.  
Ian W. Freeman  
John P. Linton, Jr.  
Charles P. Summerall, IV

G. TRENHOLM WALKER  
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December 4, 2017

U.S. MAIL  FEDERAL EXPRESS  EMAIL

Hon. Jenny Abbott Kitchings  
Clerk of Court for S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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DEC 06 2017  
SC Court of Appeals

Re: Road, LLC, et al. v. Beaufort County, et al.  
Appellate Case No. 2017-001736  
WGFL File 7087.001

Dear Ms. Kitchings:

Enclosed for filing with the Court please find Appellant's Initial Brief, Designation of Matter, and Proof of Service.

I would also like to clarify the spelling of "Pinkney" in the Court's caption. The correct spelling is "Pinckney." Please let me know if we should amend the notice of appeal to reflect the correct spelling. It was a typographical error.

Thank you very much for your courtesies in this matter

Sincerely,

WALKER GRESSETTE FREEMAN & LINTON, LLC

G. Trenholm Walker

Enclosures (As Stated)

c: C. Mitchell Brown, Esq.  
Robert W. Achurch, Esq.  
Mary B. Lohr, Esq.

**WALKER  
GRESSETTE  
FREEMAN  
LINTON** LLC

66 Hasell Street, Charleston, SC 29401  
PO Box 22167, Charleston, SC 29413

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DEC 06 2017

SC Court of Appeals

Hon. Jenny Abbott Kitchings  
Clerk of Court for S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211



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