

**STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity
Case No. 2015-CP-10-3392

Appeal No. 2017-001628

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DEC 06 2017
SC Court of Appeals

Ann M. Blandin,

Respondent-Appellant,

v.

City of North Charleston,

Appellant-Respondent.

**DESIGNATION OF MATTERS TO BE INCLUDED
IN THE RECORD ON APPEAL ON BEHALF OF
APPELLANT-RESPONDENT CITY OF NORTH CHARLESTON**

Pursuant to Rule 209, SCACR, Appellant-Respondent designates the following items for inclusion in the Record on Appeal:

Orders/Judgments

1. Order of reference, filed April 5, 2016;
2. Order denying Rule 55 motion, filed June 15, 2016;
3. Order denying Motion to Reconsider, filed July 12, 2016;
4. Order/Judgment on Damages, entered June 23, 2017;

Pleadings/Motions

5. Circuit Court Docket Sheet;
6. Complaint, filed June 15, 2015;
7. Affidavit of John E. Parker with Ex. A, filed November 10, 2015;

8. Affidavit of Service, filed July 7, 2015;
9. Entry of Default, dated November 10, 2015;
10. Motion to Set Aside Entry of Default, filed May 19, 2016, with supporting memoranda and any/all attachments;
11. Answer filed May 19, 2016;
12. Motion to Reconsider, filed June 24, 2016, with supporting memoranda and any/all attachments;

Transcripts/Exhibits

13. Hearing transcript, June 14, 2016;
14. Hearing transcript, May 2, 2017;
15. Affidavit of Karen Helms, dated May 19, 2016;
16. Affidavit of Leslie Mitchum, dated May 19, 2016;
17. Letter from Attorney Parker to Mayor, dated May 11, 2016; and
18. Email of June 14, 2016 from City Attorney Brady Hair to Judge Nicholson with attachments.

The undersigned certifies that this Designation contains no material which is irrelevant to the appeal.



HOOD LAW FIRM, LLC
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Deborah H. Sheffield, *Of Counsel* (SC #2757)
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LAW OFFICES OF J. BRADY HAIR
J. Brady Hair (SC #9040)
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P.O. Box 61896
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Attorneys for the Appellant-Respondent
City of North Charleston

December 4, 2017

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas
Mikell R. Scarborough, Master-in-Equity

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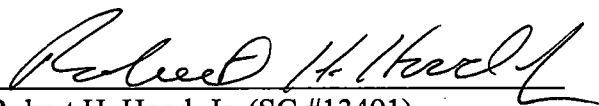
Certificate of Service

The undersigned certifies that on this 4th day of December, 2017, a copy of the Initial Appellants Brief and Designations of Matters to be Included in the Record on Appeal on behalf of Appellant-Respondent City of North Charleston was served on Counsel for all the parties by depositing a copy in the U.S. Mail, with sufficient first class postage, addressed to the following counsel at the addresses listed below:

Lawrence C. Kobrovsky, Esquire
123 Meeting Street
Post Office Box 1726
Charleston, SC 29402-1726

John E. Parker, Esquire
William F. Barnes, III, Esquire
Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A.
P.O. Box 457
Hampton, SC 29924

Hood Law Firm, LLC



Robert H. Hood, Jr. (SC #13491)
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Attorneys for the Appellant
City of North Charleston

12/4, 2017
Charleston, South Carolina

December 4, 2017

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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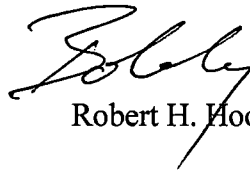
Re: Ann M. Blandin v. City of North Charleston
C/A No. 2015-CP-10-3392, Charleston CP
Appellate Case No. 2017-001628
HLF File No. 236.136

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Initial Brief and Designations of Matters to be Included in the Record on Appeal for Appellant/Respondent City of North Charleston, along with our Certificate of Service. We are also enclosing our Motion to Remove Counsel of Record, with the appropriate filing fee as Will DesChamps is no longer working in our office nor involved with this appeal. By copy of this letter we are serving all Counsel of Record. Please return a clocked-in copy of each in the attached envelope.

Kind regards,

Yours truly,



Robert H. Hood, Jr.

RHHjr/spc
Enclosure(s)

cc: J. Brady Hair, Esquire/Derk Van Raalte IV, Esquire
John E. Parker, Esquire/William F. Barnes, III, Esquire
Lawrence C. Kobrovsky, Esquire

Hasler

FC PKG RTL

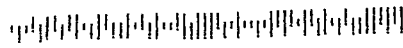
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