

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

APPEAL FROM GEORGETOWN COUNTY
COURT OF COMMON PLEAS
THE HONORABLE STEVEN H. JOHN
CIRCUIT COURT JUDGE

RECEIVED

JAN 03 2018

SG Court of Appeals

APPELLATE CASE NO. 2017-001364
CIVIL ACTION NO. 2015-CP-22-00483

Willie Singleton,

APPELLANT,

versus

City of Georgetown; Janet Grant, Individually and as
an employee of the City; Ricky Martin, individually and
as an employee of the City; Robert O'Donnell, Individually
and as Magistrate for the City of Georgetown,

RESPONDENTS.

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

Respondents in the above referenced matter propose the following be included in
the Record on Appeal:

1. Complaint, filed May 14, 2015;
2. Notice of Removal to Federal Court, filed July 26, 2015;
3. Defendants' Notice of Motion and Motion for Summary Judgment with
attached Memorandum in Support of Motion for Summary Judgment, filed
May 16, 2017 with the following attached exhibits:

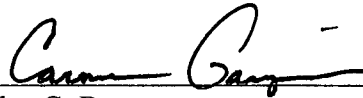
Ex. A – Excerpts of Deposition of Willie Singleton;
Ex. B – Excerpts of Deposition of Janet Grant;
Ex. C – July 28, 2010 letter to Singleton from Grant;
Ex. D – September 16, 2010 letter to Singleton from Grant;

- Ex. E – Uniform Ordinance Summons No. 1295;
- Ex. F – Transcript of Municipal Trial;
- Ex. G – Property Photographs;
- Ex. H – S.C. Court of Appeals Opinion, No. 2015-UP-009, filed January 7, 2015
- Ex. I - Order of United States District Court for South Carolina, filed February 13, 2017;

- 4. Transcript of Hearing held June 1, 2017 before The Honorable Steven H. John; and
- 5. Order Granting Summary Judgment to Defendants, filed June 9, 2017.

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

Respectfully submitted,



Douglas C. Baxter
RICHARDSON, PLOWDEN & ROBINSON, PA
2103 Farlow Street (29577)
Post Office Drawer 3646
Myrtle Beach, South Carolina 29578
(843) 448-1008

Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400

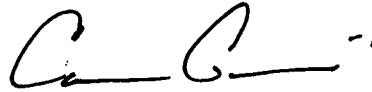
**ATTORNEYS FOR RESPONDENTS
CITY OF GEORGETOWN, JANET GRANT,
RICKY MARTIN, AND ROBERT
O'DONNELL**

January 2, 2018.

CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondents, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated January 2, 2018, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Willie Singleton
501 North Condon Street
Georgetown, SC 29440
Appellant *Pro Se*



Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR RESPONDENTS
CITY OF GEORGETOWN, JANET GRANT,
RICKY MARTIN, AND ROBERT
O'DONNELL**

Dated: January 2, 2018.

RECEIVED
JAN 03 2018
SC Court of Appeals

Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

January 2, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

JAN 03 2018

SC Court of Appeals

Re: **Willie Singleton v. City of Georgetown (2)**
Appellate Case No. 2017-001364
Case No.: 2015-CP-22-00483
RPR File No.: 2047-342

Dear Ms. Kitchings:

Enclosed for filing are the original Initial Respondents' Brief and the Respondents' Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our original Certificates of Service.

By copy of this letter, we are this day serving a copy of our Initial Brief and Designations on Appellant *pro se*.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,

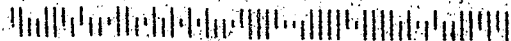


Carmen V. Ganjehsani

CVG

Enclosures

cc: Willie Singleton
Douglas C. Baxter (FYI)
Chelsea L. Monroe (FYI)

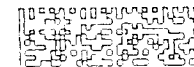


Master

FIRST-CLASS MAIL

01/02/2018

US POSTAGE \$002.03



ZIP 29204
011E1167015C

2047-342

RICHARDSON
RICHARDSON PLOWDEN ROBINSON, P.A.
PLOWDEN
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
JAN 03 2018
SC Court of Appeals