

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

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Case No.: 2017-001930

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**RECEIVED**

JAN 18 2018

SC Court of Appeals

Norris Earl White, Jr., ..... Appellant

v.

City of North Charleston, ..... Respondent

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

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Respondent proposes the following to be included in the Record on Appeal:

1. Complaint, filed December 4, 2015
2. Amended Complaint, filed February 11, 2016
3. Answer to Amended Complaint, filed February 24, 2016
4. City of North Charleston's Motion for Summary Judgment
5. City of North Charleston's Memorandum in Support of Summary Judgment with all exhibits, filed May 17, 2017
6. Front of Ticket 16290 GQ issued to White for Disorderly Conduct on December 28, 2013
7. White's Memorandum in Opposition to Summary Judgment

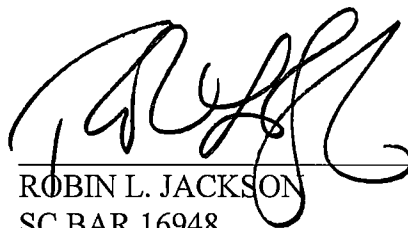
8. Order granting Summary Judgment dated June 8, 2017
9. White's Motion to Reconsider
10. White's Memorandum in Support of his Motion to Reconsider
11. City of North Charleston's Opposition to Motion to Reconsider
12. Order Denying Motion to Reconsider dated August 18, 2017

Respondent objects to Appellant's Proposed Designations as follows:

7. White's Memos in Opposition to Summary Judgment. To the extent that appellant intends to designate the supplemental memorandum that was submitted to Judge Harrington by e-mail on May 24, 2017, Respondent objects. The court's e-mail to counsel, sent the same day explicitly states that the supplemental would not be considered by the court, as it was not properly submitted. Because it was not considered by the lower court, it should not be included in the Record on Appeal.

Additional objection:

In Appellant's brief, page 16, footnote 2, counsel asserts that he will prepare a summary exhibit relating to two Affidavits signed by Laura Fitzpatrick. Respondent objects to any document prepared by counsel that was not submitted to the trial court for consideration.



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Attorney for Respondent

January 16, 2018

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Case No.: 2017-001930

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of Respondent's Initial Brief and Respondent's Designation of Matter has been served upon Counsel for the Appellant by mailing a copy properly addressed with sufficient postage affixed thereto this 16<sup>th</sup> day of January, 2018, to the following:

Milt Stratos II, Esquire  
Joye Law Firm  
P.O. Box 62888  
North Charleston, SC 29419-2888

  
ROBIN L. JACKSON

  
*Senn Legal*  
—LLC—  
ATTORNEYS AT LAW

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January 16, 2018

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

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SC Court of Appeals

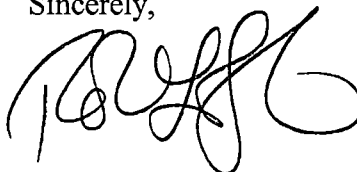
RE: White v. North Charleston Police Department  
Case No.: 15-CP-10-6561  
IRF Claim No.: 16319

Dear Madam Clerk:

Please find enclosed the original and one copy of the Initial Brief of Respondent and Designation of Matter. Please file these and return one file stamped copy to me in the enclosed self addressed stamped envelope.

With kind regards, I am,

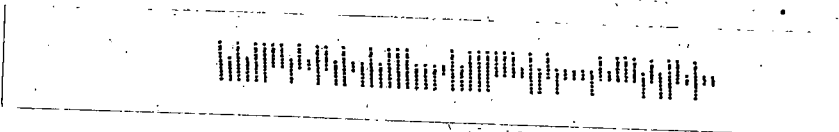
Sincerely,



Robin L. Jackson

RLJ/mos  
Enclosures

cc: Milt Stratos, Esquire



Post Office Box 12279  
Charleston, SC 29422-7279

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