

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
Common Pleas

Kristi L. Harrington, Circuit Court Judge

**RECEIVED**  
MAR 14 2018  
SC Court of Appeals

CASE NO. 2015-CP-10-05379  
Appellate Tracking Number 2017-002317

William Sean Irvin, Jr., as Personal Representative of the Estate of  
Jonathan Edward Irvin, Deceased, ..... Appellant,

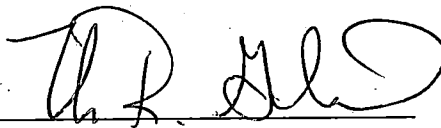
v.

City of Folly Beach, South Carolina Department of Highways and Public Transportation,  
Daniel Wilcutt, and Mitchell Dewitt Rabon, Jr., of whom

Mitchell Dewitt Rabon, Jr., is ..... Respondent.

APPELLANT'S DESIGNATION OF CONTENTS OF RECORD ON APPEAL

March 12, 2018



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**ORDERS**

Hon Kristi L. Harrington June 8, 2017 (Granting Summary Judgment)  
Hon. Kristi L. Harrington October 11, 2017 (Denying Reconsideration)

**PLEADINGS**

Complaint October 6, 2015  
Amended Complaint February 2, 2016  
Rabon Answer February 18, 2016  
Rabon Answer May 4, 2016  
Rabon Motion for Summary Judgment March 8, 2017  
Irvin Affidavit May 16, 2017  
Motion for Reconsideration June 28, 2017  
Notice of Appeal November 6, 2017  
Amended Notice November 13, 2017

**AFFIDAVITS**

Affidavit of William Irvin, Jr.

**MEMORANDA**

Memorandum in Opposition August 23, 2017

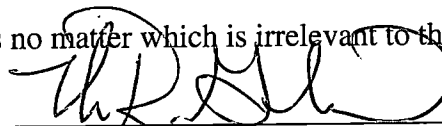
**TRANSCRIPTS**

Transcript of Summary Judgment Hearing May 16, 2017

Certificate of Counsel

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

March 12, 2018



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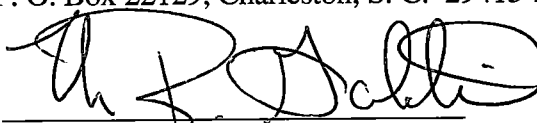
City of Folly Beach, South Carolina Department of Highways and Public Transportation,  
Daniel Wilcutt, and Mitchell Dewitt Rabon, Jr., of whom

Mitchell Dewitt Rabon, Jr. is ..... Respondent.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant and Designation of Contents of Record on Appeal on Respondent, Mitchell Dewitt Rabon, Jr., by depositing a copy of it in the United States Mail, postage prepaid, on March 12, 2018, addressed to his attorney of record, Mr. David S. Cobb, TURNER PADGET, L.L.P., P. O. Box 22129, Charleston, S. C. 29413-2129.

March 12, 2018



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March 12, 2018

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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SC Court of Appeals

Re: Estate of Irvin vs. City of Folly Beach, *et. al.*  
Case Number: 2015-CP-10-05379  
Appellate Tracking Number 2017-002317

Dear Ms. Kitchings,

I enclose an original and an extra copy of Appellant's initial brief and designation of contents of record on appeal along with a certificate of service, and a self-addressed, return envelope. Would you be so kind as to file the original and return a clocked copy to me in the envelope provided? By copy of this letter, I am sending a copy to opposing counsel and providing a copy to all counsel of record. I thank you in advance for your attention to this request. With kind regards, I am

Very truly yours,  
BELK, COBB, INFINGER & GOLDSTEIN, P.A.

  
Thomas R. Goldstein

TRG/

enclosure: Initial Brief, Designation of Contents of Record on Appeal, return envelope

cc:

Victoria Anderson (with enclosure)  
David Cobb (with enclosure)  
Max Mahaffee (with enclosure)  
Roy Maybank (with enclosure)

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