

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
In the Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

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Circuit Case No.: 2015-CP-10-5379  
Appellate Case No.: 2017-002317

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**RECEIVED**  
APR 11 2018  
SC Court of Appeals

William Sean Irvin, Jr. as PR for the Estate of  
Jonathan Edward Irvin, Deceased ..... Appellant,

v.

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

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

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

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David S. Cobb  
TURNER PADGET  
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ATTORNEYS FOR APPELLANT

April 11, 2018

### Designation of Matter

1. Complaint of William Sean Irvin, Jr., as Personal Representative for the Estate of Jonathan Edward Irvin, Deceased, Civil Action No. 2015-CP-10-5379.
2. Amended Complaint of William Sean Irvin, Jr., as Personal Representative of the Estate of Jonathan Edward Irvin, Deceased.
3. Defendant Mitchell Dewitt Rabon, Jr.'s Answer.
4. Defendant Mitchell Dewitt Rabon, Jr's Notice of Motion and Motion for Summary Judgment.
5. Transcript of Record for Hearing of May 16, 2017.
6. Affidavit of Will Irvin filed May 16, 2017 with attachments.
7. Deposition Transcript of William Sean Irvin, Jr., pages 68-70.
8. Defendant Daniel Wilcutt's Answer.

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

I CERTIFY THAT THIS DESIGNATION DOES NOT CONTAIN ANY  
MATTER THAT IS IRRELEVANT TO THIS APPEAL

*B. Hate R. A.*  
for David S. Cobb  
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PROOF OF SERVICE

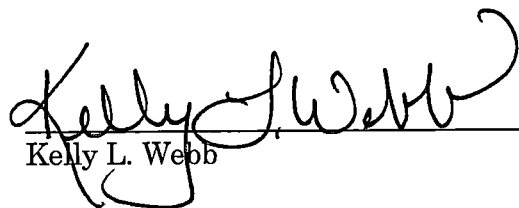
On April 11, 2018, I mailed a copy of **Respondent's Initial Brief, and Respondent's Designation of Matter** to:

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Post Office Box 71121  
North Charleston, South Carolina 29415  
-and-  
Brooklyn O'Shea  
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Charleston, South Carolina 29412  
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Department of Transportation**

  
\_\_\_\_\_  
Kelly L. Webb

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April 11, 2018

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SC Court of Appeals

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

Re: 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  
Appellate Docket No.: 2017-002317  
TP File No.: 4000.2169

Dear Ms. Kitchings:

We enclose the original and one copy of Respondent's Initial Brief, Respondent's Designation of Matter to be Included in the Record on Appeal, and proof of service. Please file the originals and return the filed copies to our runner. If you have any questions or need additional information, please call me at your convenience. With kind regards,

TURNER PADGET

*R. Haste RA*

*for* David S. Cobb

DSC/hah

enclosures

cc: counsel of record (with enclosures)