

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

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

RECEIVED
APR 25 2018
SC Court of Appeals

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

April 23, 2018

Brooklyn O'Shea, #102505
Ian O'Shea, 100712
O'Shea Law Firm
1120 Folly Road
Charleston, S. C. 29412
(843) 805-4943
E-mail: ioshea@theoshealawfirm.com
E-mail: brook@theoshealawfirm.com

Thomas R. Goldstein, #2186
Belk, Cobb, Infinger & Goldstein, P.A.
Attorneys for Respondent
P. O. Box 711121
N. Charleston, South Carolina 29415-1121
(843) 554-4291; (843) 554-5566 (fax)
E-mail: tgoldstein@cobblaw.net

ORDERS

Hon Kristi L. Harrington June 8, 2017 (Granting Summary Judgment)
Hon. Kristi L. Harrington October 11, 2017 (Denying Reconsideration)
Amended Scheduling Consent Order October 5, 2017

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

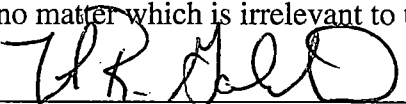
TRANSCRIPTS

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.

April 23, 2018



Thomas R. Goldstein, #2186
Belk, Cobb, Infinger & Goldstein, P.A.
P. O. Box 71121
N. Charleston, S. C. 29415-1121
(843) 554-4291

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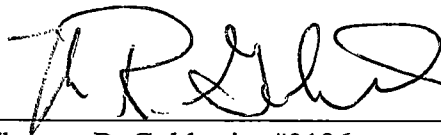
City of Folly Beach, South Carolina Department of Highways and Public Transportation,
Daniel Wilcutt, and Mitchell Dewitt Rabon, Jr., of whom

Mitchell Dewitt Rabon, Jr. is Respondent.

PROOF OF SERVICE

I certify that I have served the Initial Reply 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 April 23, 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.

April 23, 2018



Thomas R. Goldstein, #2186
Belk, Cobb, Infinger & Goldstein, P.A.
P. O. Box 71121
N. Charleston, S. C. 29415-1121
(843) 554-4291; (843) 554-5566 (fax)
Attorneys for Appellant

Other Counsel of Record:

Mr. David S. Cobb
Turner Padget, LLP
P. O. Box 22129
Charleston, S. C. 29413-2129
843-576-2803
dcobb@turnerpadget.com
ATTORNEYS FOR RESPONDENT,
MITCHELL DEWIT RABON, JR.

Mr. Max G. Mahaffee
Grimball & Cabaniss, LLC
Post Office Box 816
Charleston, SC 29402-0816
843-722-0311
max.mahaffee@grimcab.com
ATTORNEYS FOR DANIEL WILLCUTT

Ms. Victoria L. Anderson
Young Clement Rivers, LLP
P. O. Box 993
Charleston, S. C. 29402
843-720-5453
tanderson@ycrlaw.com
ATTORNEYS FOR CITY OF
FOLLY BEACH

Mr. Roy P. Mabank
Maybank Law Firm, LLC
P. O. Box 12579
Charleston, S. C. 29422
843-766-8101
roy@maybanklaw.com
ATTORNEYS FOR SCDOT

BELK, COBB, INFINGER AND GOLDSTEIN, P.A.

Harry C. Belk (1919-2003)
Dale T. Cobb, Jr.

ATTORNEYS AT LAW
2344 COSGROVE AVENUE
CHARLESTON, SC 29405

Mailing Address:
P.O. Box 71121
Charleston, SC
zip 29415-1121
Ph: (843) 554-4291
Fax: (843) 554-5566

Peggy M. Infinger
pinfinger@cobblaw.net

Thomas R. Goldstein
tgoldstein@cobblaw.net

April 23, 2018

Hon. Jenny Abbott Kitchings
Clerk of Court,
ATTN.: ELIZABETH CARTER
South Carolina Court of Appeals
1220 Senate Street
Columbia, S. C. 29201

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Re: William Sean Irvin vs. City of Folly Beach (Rabon), *et. al.*
Case Number: 2015-CP-10-05379
Appellate Tracking No.: 2017-002317

Dear Ms. Carter,

I enclose an original and an extra copy of the appellant's initial reply brief and designation of contents of record on appeal. I also enclose a proof of service. Would you be so kind as to file the original and return a filed copy in the envelope provided? By copy of this letter, I am providing a copy to all counsel of record. I thank you in advance for your attention to this request. With kind regards, I am

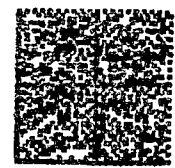
Very truly yours,
BELK, COBB, INFINGER & GOLDSTEIN, P.A.


Thomas R. Goldstein

TRG/
enclosure: reply brief, designation, return envelope

cc: Victoria Anderson
David Cobb
Max Mahaffee
Roy Maybank

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