

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LAURENS COUNTY  
Court of Common Pleas

Frank R. Addy, Jr. Circuit Court Judge

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**RECEIVED**  
MAY 18 2018  
SC Court of Appeals

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C.A. No. 2017-CP-30-0008  
Appellate Case No. 2017-001831

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MOSI BUNDU AND MALCOLM DJ WATTS..... Appellants,

v.

RICKY CHASTAIN, AS LAURENS COUNTY SHERIFF,  
MICHAEL GAINEY, SOCRATES D. LEDDA, AS LAURENS CITY  
POLICE CHIEF, JOHN DOE(S), LAURENS COUNTY SHERIFF'S  
DEPARTMENT, LOGAN KANIPE, AND LAURENS CITY POLICE  
DEPARTMENT..... Respondents.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

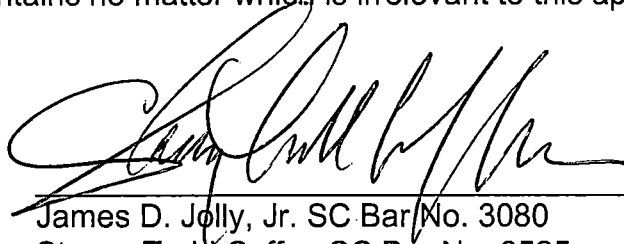
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Respondents Ledda, Gainey, Kanipe and Laurens City Police Department  
propose the following matter to be included in the Record on Appeal:

1. Complaint, filed January 4, 2017;
2. Answer on behalf of Socrates Ledda, Sgt. Michael Gainey, and Officer Logan Kanipe, filed February 16, 2017;
3. Motion to Dismiss Under 12(b)(6), filed February 16, 2017;
4. Memorandum in Support of Motion to Dismiss under Rule 12(b)(6);
5. Transcript of Motion to Dismiss hearing held before Judge Frank Addy, Jr. on June 1, 2017;
6. Form 4 Order dated 6/1/17, signed by Judge Frank Addy, Jr.;
7. Request/Motion to Vacate filed by Appellants on June 2, 2017;
8. Transcript of hearing held before Judge Frank Addy, Jr. on August 1, 2017;

9. Form 4 Order dated August 1, 2017, signed by Judge Frank Addy, Jr.
10. Notice of Appeal dated August 31, 2017;
11. Amended Notice of Appeal dated September 13, 2017;
12. Amendment to Complaint served on February 25, 2018.

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



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James D. Jolly, Jr. SC Bar No. 3080  
Stacey Todd Coffee SC Bar No. 6525  
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1805 North Boulevard  
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(864)226-1910  
(864)226-1931 (fax)  
Attorneys for Attorneys for Respondents  
Ledda, Gainey, Kanipe, and Laurens City  
Police Department

Anderson, South Carolina  
Date: May 15, 2018

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DEPARTMENT, LOGAN KANIPE, AND LAURENS CITY POLICE  
DEPARTMENT..... Respondents.

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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that a copy of the Initial Brief of Respondents Ledda, Gainey, Kanipe, and Laurens City Police Department was served by first class mail, postage prepaid this 15th day of May 2018, upon the following:

Mosi A Bundu  
206B Mock St.  
Laurens, SC 29306

Malcolm DJ Watts  
1935 Curry Road  
Laurens, SC 29360

Russell W. Harter, Jr.  
Chapman, Harter & Harter



Stacey Todd Coffee, Esquire  
Email: coffee@loganjollysmith.com

May 15, 2018

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1805 North Boulevard  
Anderson, SC 29621  
Telephone: 864-226-1910  
Facsimile: 864-226-1931

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

Re: Mosi A. Bundu and Malcolm DJ Watts v. Ricky Chastain, County Sheriff's Dept.; Socrates Ledda, City Police Chief; Sgt. Michael Gainey and Officer Logan Kanipe  
Case No. 2017-CP-30-0008  
Appellate Case No. 2017-001831

Mailing Address  
Post Office Box 259  
Anderson, SC 29622

Dear Ms. Kitchings:

Please find enclosed for filing the Respondent's Initial Brief, Designation of Matter to be Included in the Record of Appeal, and the Certificate of Service in the above referenced matter. Please return a clocked in copy of the same to me in the enclosed self-addressed stamped envelope.

www.loganjollysmith.com

If you have any questions, please do not hesitate to contact me.

With kind regards, I remain,

Yours very truly,

Logan, Jolly & Smith, LLP

Stacey Todd Coffee

STC:hgc

Enclosure

cc: Mosi Bundu  
Malcolm DJ Watts  
Russell W. Harter, Jr.



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