

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from the Administrative Law Court

Honorable Ralph King Anderson, III  
Chief Administrative Law Judge

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Appellate Case No.: 2017-002598

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**RECEIVED**  
MAY 30 2018  
SC Court of Appeals

Charles S. Blackmon and South Carolinians for Responsible  
Agricultural Practices,

Appellants,

vs.

South Carolina Department of Health and Environmental  
Control and David Coggins Broilers,

Respondents,

Charles S. Blackmon and South Carolinians for Responsible  
Agricultural Practices,

Appellants,

vs.

South Carolina Department of Health and Environmental  
Control and Heath Coggins Broilers,

Respondents,

Charles S. Blackmon and South Carolinians for Responsible  
Agricultural Practices,

Appellants,

vs.

South Carolina Department of Health and Environmental  
Control and Jim Young Broilers,

Respondents.

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**Designation of Matter to be  
Included in the Record on Appeal**

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Respondent South Carolina Department of Health and Environmental Control proposes the following be included in the Record on Appeal:

1. Statements of Staff Position filed in response to the RFRs challenging the Permits issued DC Broilers, HC Broilers, and JY Broilers (3 documents);
2. Denials of Final Review Conf. for DC Broilers and HC Broilers (3 documents);
3. Denials of Final Review Conf. for DC Broilers and HC Broilers (3 documents);

4. Joint Order and Decision;
5. Order on Joint Motion to Consolidate for Hearing Purposes, filed March 29, 2017;
6. Respondent Broiler Facilities Motion for Partial Summary Judgment;
7. Transcript of Blackmon, et al. v. SC DHEC, et al. held before the ALC on August 15-17, 2017;
8. Respondent DHEC's Response to Court's Inquiry, dated November 3, 2017;
9. Final Order and Decision;
10. 

DHEC_000877	DHEC_000878	DHEC_000897
DHEC_000901	DHEC_000902	DHEC_000903
DHEC_000904	DHEC_000905	DHEC_000906
DHEC_000907	DHEC_000908	DHEC_000909
DHEC_000910	DHEC_000920	DHEC_000922
DHEC_000923	DHEC_000924	DHEC_000925
DHEC_000926	DHEC_000927	DHEC_000928
DHEC_000929	DHEC_000930	DHEC_000931
DHEC_000932	DHEC_000933	DHEC_000934
DHEC_000935	DHEC_000936	DHEC_000937
DHEC_000938	DHEC_000997	DHEC_002044
DHEC_002049	DHEC_002050	DHEC_002051
DHEC_002052	DHEC_002053	DHEC_002054
DHEC_002055	DHEC_002056	DHEC_002057
DHEC_002058	DHEC_002059	DHEC_002065
DHEC_002067	DHEC_002068	DHEC_002069
DHEC_002070	DHEC_002071	DHEC_002072
DHEC_002073	DHEC_002074	DHEC_002075
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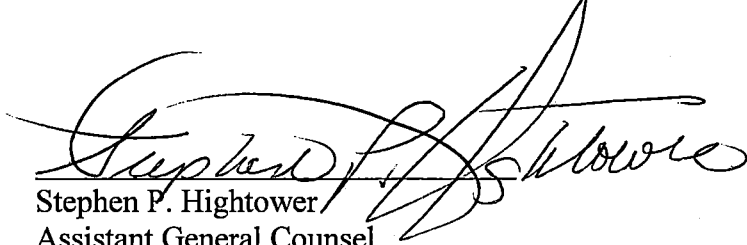
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DHEC\_003192  
DHEC\_003195  
DHEC\_003198  
DHEC\_003201  
DHEC\_003243

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

May 29, 2018



Stephen P. Hightower  
Assistant General Counsel

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Attorney for Respondent SCDHEC

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Administrative Law Judge

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Appellate Case No. 2017-002598

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.....Respondents.

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.....Respondents.

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**CERTIFICATE OF SERVICE**

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I, Donna Hellerman, Legal Assistant for the South Carolina Department of Health and Environmental Control, hereby certify that I have on this 29<sup>th</sup> day of May, 2018, served a copy of the *Initial Brief and Designation of Matter of Respondents South Carolina Department of Health and Environmental Control*, upon all parties and counsel of record in the above-captioned case, via United States Mail, First Class, postage prepaid, addressed as follows:

Stephen P. Hightower  
Assistant General Counsel

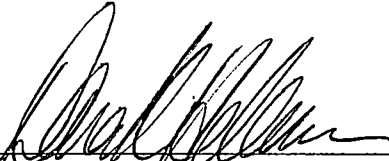
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Broilers and Jim Young Broilers

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Attorneys for Charles Blackmon and  
South Carolinians for Responsible  
Agricultural Practices



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Donna Hellerman

May 29, 2018  
Columbia, South Carolina



Healthy People. Healthy Communities.

May 29, 2018

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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SC Court of Appeals

Re: Charles S. Blackmon v. SCDHEC  
Appellate Case No. 2017-002598  
OGC #22908

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the *Respondent South Carolina Department of Health and Environmental Control's Initial Brief and Designation of Matter* for filing in the above referenced case. I would appreciate your office returning the stamped copy in the enclosed self-addressed stamped interoffice envelope.

By copy of this letter, I am serving all counsel of record.

Should you have any questions or need additional information, please do not hesitate to contact our office.

Very truly yours,

Donna K. Hellerman

Legal Assistant to Stephen P. Hightower  
Assistant General Counsel

Enclosures as stated

cc: Stephen P. Hightower (via email only)  
Michael S. Traynham (via email only)  
Robert Guild, Esquire  
M. McMullen Taylor, Esquire  
Benjamin P. Mustian, Esquire  
Mitchell Willoughby, Esquire  
Tracy C. Green, Esquire



South Carolina Department of Health  
and Environmental Control  
2600 Bull Street, Columbia, SC 29201-1708

Look for DHEC's Web Site at <http://www.scdhec.gov>

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