

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

Case No.: 2017-001628

RECEIVED
APR 24 2018
SC Court of Appeals

Ann M. Blandin Respondent-Appellant,

v.

City of North Charleston Appellant-Respondent,

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

Respondent-Appellant designates the following items for inclusion in the Record on Appeal, in addition to the materials designated by the Appellant-Respondent.

- 1) Judgment and Order filed June 23, 2017;
- 2) Order denying Defendants Motion to Reconsider, filed July 12, 2016;
- 3) Order denying Defendants Motion to Set Aside Default, filed June 15, 2016;
- 4) Order of Reference, filed April 5, 2016;
- 5) Summons and Complaint, filed June 15, 2015;
- 6) Affidavit of Service, filed July 7, 2015;
- 7) Motion to Set Aside Entry of Default and for Late Answer, filed May 19, 2016;
- 8) Entry of Default, filed November 10, 2015;
- 9) Defendant's Motion to Reconsider, filed June 24, 2016;

- 10) Damages Hearing Transcript from May 2, 2017:
 - Pages 1-59; 74; 76-95; 106-118; 123; 131-132;
- 11) Damages Hearing Exhibits: Nos. 3, 4, 5, 8, 9, 11, 12, and 31
- 12) Blandin's Notice of Appeal, filed August 3, 2017;
- 13) City's Notice of Appeal dated July 28, 2017;
- 14) City's Amended Notice of Appeal, dated January 19, 2018;
- 15) Affidavit of Leslie Mitchum, dated May 19, 2016;
- 16) Affidavit of Karen Helms, dated May 19, 2016;
- 17) Defendant's June 1, 2016 Letter to Scarborough, filed June 8, 2016;
- 18) Letter of August 1, 2017 from Barnes to Court Reporter Smith requesting complete transcript;
- 19) Letter of August 1, 2017 from Barnes to Clerk of Court Armstrong filing copy of Notice of Appeal;
- 20) Letter of August 1, 2017 from Barnes to Clerk, SC Court of Appeals filing Notice of Appeal; and
- 21) Letter of October 4, 2017 from Barnes to Clerk, SC Court of Appeals – advising transcript received;

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

[SIGNATURE TO FOLLOW ON NEXT PAGE]

PETERS, MURDAUGH, PARKER,
ELTZROTH & DETRICK, P.A.

April 20, 2018
Hampton, South Carolina

BY: Wil. Barnes

John E. Parker
William F. Barnes, III
101 Mulberry Street, East
Post Office Box 457
Hampton, SC 29924
Phone: (803) 943-2111

-And-

Lawrence C. Kobrovsky
123 Meeting Street
Charleston, SC 29401
Phone: (843) 853-3703
ATTORNEYS FOR RESPONDENT-APPELLANT

IN THE STATE OF SOUTH CAROLINA
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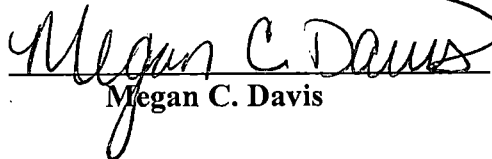
City of North Charleston Appellant-Respondent,

CERTIFICATE OF SERVICE

This is to certify that I, **Megan C. Davis**, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Counsel for the Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within **Respondent-Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal** to:

Robert H. Hood, Jr., Esquire
Deborah Harrison Sheffield, Esquire
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402

Attorneys for Appellant-Respondent


Megan C. Davis

April 20th, 2018
Hampton, South Carolina

LAW OFFICES
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK

PROFESSIONAL ASSOCIATION

OVER 100 YEARS OF LEGAL SERVICE-EST. 1910

JOHN E. PARKER
DANIEL E. HENDERSON
MARK D. BALL
RANDOLPH MURDAUGH, IV
RONNIE L. CROSBY
R. ALEXANDER MURDAUGH
BERT G. UTSEY, III
RANDOLPH MURDAUGH, III
GRAHAME E. HOLMES
LEE D. COPE
MATTHEW V. CREECH
LEAGUE B. CREECH
STEVEN D. MURDAUGH
WILLIAM F. BARNES, III
AUSTIN H. CROSBY
NEIL E. ALGER

RANDOLPH MURDAUGH, SR.
(1887-1940)
RANDOLPH MURDAUGH, JR.
(1915-1998)
J. ROBERT PETERS, JR.
(1927-2008)
J. PAUL DETRICK
(1948-2016)
CLYDE A. ELTZROTH, JR. - RET

April 20, 2018

William F. Barnes, III
Direct Dial: (803) 914-6702
Email: wbarnes@pmped.com
Paralegal: mdavis@pmped.com

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

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SC Court of Appeals

Re: Ann Blandin v. City of North Charleston
Appellate Case No.: 2017-001628

Dear Ms. Kitchings:

Please find enclosed the original and two copies of *Respondent-Appellant's Initial Brief, Designation of Matter to be Included in the Record on Appeal*, and *Certificate of Service* in the above-referenced matter. Please file the originals and return clocked-in copies of each in the envelope provided.

By copy of this letter, Respondent-Appellant's Initial Brief and Designation of Matter are being served on all counsel of record.

With kind regards, I am

Sincerely,



William F. Barnes, III

WFB/mcd
Enclosures as stated

cc: Robert H. Hood, Jr., Esquire
Deborah Harrison Sheffield, Esquire
Lawrence C. Kobrovsky, Esquire



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101 Mulberry Street East
Post Office Box 457
Hampton, South Carolina 29924

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TO:

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
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