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The State of South Carolina  
In The Court of Appeals

Appeal from Charleston County  
Hon. Deadre Jefferson, Circuit Court Judge

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JUL 05 2018  
SC Court of Appeals

Case No. 2014-CP-10-4591  
Appeal 2017-002392

Jane Doe 202, by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe, Appellant,

Appellant

v.

City of North Charleston,  
Leigh Anne McGowan, individually,  
Charles Francis Wholleb, individually,  
Anthony M. Doxey, individually

Respondents

Motion to Settle the Record

The appellant moves to settle the record to exclude irrelevant material designated for inclusion in the record by the Respondents. Specifically, Respondents seek to include in the record certain post-trial motions by respondents, each of which was denied, and having nothing to do with any issue on appeal.

The items which are irrelevant to this appeal are:

1. Defendants' Petition for attorneys' fees and costs pursuant to 42 U.S.C. §

2. Defendants' Motion for attorneys fees and costs pursuant to the S.C. Frivolous Proceedings Act.
3. Order denying respondents' post-trial motions.

None of the post-trial motions are relevant to the appeal which concerns only issues which arose during the trial.

The apparent purpose in proposing to include the irrelevant matter in the record is the defendants' unrelenting personal attacks on the appellant and her family, and defendants' attempts to publicize the name of the appellant, which is protected by an order of the trial court.

Respectfully submitted,



*for* Gregg Meyers, SC Bar No. 9908  
Of Counsel, Pierce Sloan LLC  
321 East Bay Street  
Charleston SC 29401  
843-722-7733, 843-722-7732 facsimile  
greggmeyers@piercesloan.com

Other counsel of Record:  
Chris Dorsel  
Senn Legal, LLC  
3 Wesley Drive  
Charleston SC 29407

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**Proof of Service**

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I hereby affirm that I have served upon counsel for the defendant/respondent a copy of

**Motion to Settle the Record**

By placing a copy of the documents in the United States mail, first-class postage pre-paid, addressed to:

Chris Dorsel  
Senn Legal, LLC  
3 Wesley Drive  
Charleston SC 29407

Done July 2, 2018.



*for* Gregg Meyers  
Of Counsel  
Pierce Sloan LLC  
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July 2, 2018

Jenny Abbott Kitchings, Clerk of Court  
The South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Jane Doe 202 by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe, Appellant, v. City of North Charleston, Leigh Anne McGowan, Individually, Charles Francis Wholleb, Individually, Anthony M. Doxey, Individually  
Appeal No. 2017-002392  
Civil Action No. 2014-CP-10-4591  
File No. GM0023

Dear Ms. Kitchings:

Enclosed for filing with the Court please find an original and 6 copies of Appellant's Motion to Settle the Record with Proof of Service, in the above-referenced case.

With kind regards,

Sincerely,

  
Gregg E. Meyers

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SC Court of Appeals

GEM/mkg  
Enclosure

cc: Christopher Dorsel, Esquire (w/ encl.)



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