

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2018-001262

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SC Court of Appeals

Dorchester County Taxpayers Association, individually and on behalf of all others similarly situated, Weatherstone Property Owners Association, individually and on behalf of all others similarly situated, George Resnick, William A. Harbeson, James Stephen Greene, Jr., Homer P. Gonzalez, Gerald E. Ziegler and South Carolina Public Interest Foundation, Appellants,

v.

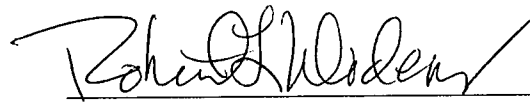
Dorchester County, Dorchester County Council, David Chinnis, George Bailey, Jay Byars, Willie Davis, Carroll S. Duncan, Larry Hargett and William R. Hearn, Jr., in their official capacities as members of Dorchester County Council, Town of Summerville, Summerville Town Council, William E. McIntosh, III, in his official capacity, Dorchester County Sheriff, Luther C. Knight, in his official capacity, Dorchester School District Two, Dorchester School District Two Board of Trustees, Joseph R. Pye, Justin Farnsworth, Gail Hughes, Brian Mitchum, Tanya Robinson, Sam Clark, Barbara Crosby and Lisa Tupper, in the official capacities, Dorchester School District Four, Dorchester School District Four Board of Trustees, Dorchester County Career and Technology Center, and Dorchester County Career and Technology Center Board of Trustees, Respondents.

**Respondents Town of Summerville, Summerville Town Council,
and William E. McIntosh, III
Designation of Matter to be Included in Record on Appeal**

Respondents Town of Summerville, Summerville Town Council, and William E. McIntosh, III propose the following additional matters be included in the Record on Appeal:

Original Complaint
Amended Complaint
Town Defendants' Motion to Dismiss Amended Complaint
County Defendants' Motion to Dismiss Amended Complaint
Consent Order, re: Motions to Dismiss Amended Complaint
Proposed Order (on merits) submitted by Town Defendants and County Defendants
Town and County Defendants' Memo in Opposition to Plaintiff's Motion to Alter or Amend

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



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Attorneys for Respondents
Town of Summerville
Summerville Town Council
William E. McIntosh, III

January 9, 2019
Columbia, South Carolina

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v.

Dorchester County, Dorchester County Council, David Chinnis, George Bailey, Jay Byars, Willie Davis, Carroll S. Duncan, Larry Hargett and William R. Hearn, Jr., in their official capacities as members of Dorchester County Council, Town of Summerville, Summerville Town Council, William E. McIntosh, III, in his official capacity, Dorchester County Sheriff, Luther C. Knight, in his official capacity, Dorchester School District Two, Dorchester School District Two Board of Trustees, Joseph R. Pye, Justin Farnsworth, Gail Hughes, Brian Mitchum, Tanya Robinson, Sam Clark, Barbara Crosby and Lisa Tupper, in the official capacities, Dorchester School District Four, Dorchester School District Four Board of Trustees, Dorchester County Career and Technology Center, and Dorchester County Career and Technology Center Board of Trustees, Respondents.

CERTIFICATE OF SERVICE

I, Ann Shuler, an employee of Burr & Forman, LLP, hereby certify that true and correct copies of the *Initial Brief of Respondents Town of Summerville, Summerville Town Council, and William E. McIntosh, III* and *Respondents Town of Summerville, Summerville Town Council, and William E. McIntosh, III Designation of Matter to be Included in Record on Appeal* were served upon all counsel of record in the above-captioned matter, by causing copies of same to be deposited

in the United States Mail, first class postage prepaid, this 9th day of January, 2019, addressed as follows:

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Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

**Re: Dorchester County Taxpayers Association, et al -v- Dorchester County, et al
Appellate Case No. 2018-001262**

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the *Initial Brief of Respondents Town of Summerville, Summerville Town Council, and William E. McIntosh, III* and the original and one copy of *Respondents Town of Summerville, Summerville Town Council, and William E. McIntosh, III Designation of Matter to be Included in Record on Appeal*. Please file the originals in your office and return the file stamped copies to me in the return envelope provided. By copy of this letter, we are serving counsel of record with copies of same.

Thank you for your assistance regarding this matter.

Burr & Forman LLP

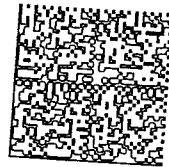


Robert L. Widener

RLW:as
Enclosures

Honorable Jenny Abbott Kitchings
January 9, 2019
Page 2

cc: David L. Morrison Esquire
Thomas K. Barlow Esquire
Kenneth A. Davis Esquire
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Adam Jordan Mandell Esquire
Anthony E. Rebollo Esquire
William H. Davidson Esquire
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Drew Hamilton Butler Esquire



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