

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

2018-001089

RECEIVED
FEB 14 2019
SC Court of Appeals

Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp, Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons, Plaintiffs,

Of whom Gwendolyn Brown, Deville Kiez Simmons, and Haroldett Uneke Simmons are.....Appellants,

vs.

Housing Authority of the City of Charleston, South Carolina.....Respondent.

DESIGNATION OF MATTER

The Respondent proposes the following to be included in the Record on Appeal:

1. Letter to the City of Charleston Housing Authority dated October 4, 2007
2. Deposition of Patricia S. Gerber (Volume I)
3. Deposition of Cyrus Higgs
4. Transcript of Record dated February 7, 2018
5. Certificate of Mold Analysis Report dated September 4, 2008

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

{Signature Page Follows}

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lohr
Post Office Box 40
Beaufort, SC 29901-0040
(843) 522-2400
Attorney for Respondent

Beaufort, South Carolina

February 12, 2019

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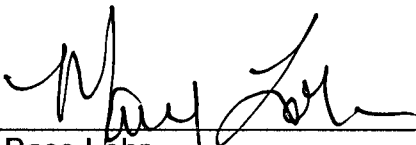
PROOF OF SERVICE

The undersigned counsel hereby certifies that she has served the foregoing Initial Brief of Respondent and Designation of Matter upon all counsel of record by affixing same with proper postage and placing same with the United States Postal Service on 12th day of February, 2019 addressed to the following:

J. Seth Whipper, Esquire
Whipper Law Firm
Post Office Box 70070
North Charleston, SC 29415

{Signature Page Follows}

HOWELL, GIBSON & HUGHES, P.A.

By: 
Mary Bass Lohr
Post Office Box 40
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Attorney for Housing Authority of the
City of Charleston

Beaufort, South Carolina

February 12, 2019

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February 12, 2019

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp, Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons vs. Housing Authority of the City of Charleston, South Carolina
2014-CP-10-043
Civil Action No.: 2018-001089
Our File No: 11845 MBL

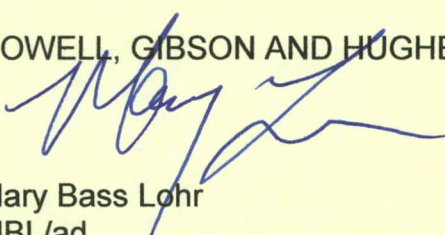
Dear Ms. Kitchings:

Please find enclosed herewith for filing *Initial Brief of Respondent* and *Designation of Matter* with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

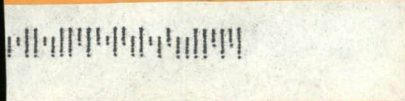
Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.


Mary Bass Lohr
MBL/ad

Enclosure

cc: J. Seth Whipper



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HOWELL, GIBSON & HUGHES, P.A.
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Beaufort, SC 29901-0040

TO:

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211
