

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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Case No. 15-CP-10-5415

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Charleston Development Company, LLC, Charleston Housing Company, LLC and NotSo Hostel, LLC,

Appellants,

v.

Younesse Alami, Simon M. Adell, Matthew Anderson, Matthew Asher, Daniel Baker, Marie Baker, Matthew and Christina Bare, Andre Bauer, Peter Bierce, Brandon Blount, Barbara Brass, Richard T. Brewer, Sigrid Anne Eilertson, Reginald P. Brown IV, Mary Cahill, Ryan Cockrell, Kevin and Virginia Conlon, Anne Marie Crevar, Christina Cross, Darryl J Damico, Labar Daniel, Stephen Darwak, Lindsay Davenport, Mary Dickerson, Maxwell Streeter, Kathleen Dougherty, David Dressman, Anna Dressman, Michael Elder, Christopher Scott Farley, Michele Ghastin, Timnah Giller, Virginia Geller, Ryan Gilreath, Sonya Gilreath, Kimberly Glenn, Shaun Halsor, Josephine Rex, Arthur Halvorson, Andrew Halvorson, Linda Hancock, Laura Hyatt, Mike Hartel, Nathan Herring, James Hicks Jr., Laurie Hicks, Preston G Hipp, Colin Jones, Matthew F. Jones, Robert C. Jones, Robin Joseph, Molly Keeler, John Kenny, Mandi Walters, Abigail King, Aaron Kless, Laurie Kramer, Robert Kramer, Allison Kreutzer, Benjamin Levitt, Richard Levitt, Jesse Lutz, Nikou Manouchehri, Thomas Naselaris, Zoe Naselaris, Beau O'Steen, Cori O'Steen, Lance Parr, Brandon Perdue, Amanda Lee Raymer, Hadassah Rothenberg, Daniel Ryan, Kimberly Bowlin, Kevin Schnittker, Ginger Scofield, Inderjit Singh, Avtar Singh, Alecia Stevens, Lee Stevens, Justin Swan, Merrick Teichman, John Van Vlack, Jr, William Waterhouse, Jennifer Waterhouse, Anne Wohlfeil, Bryan Young, AJB Trust, Anthony & Jacqueline Bradley, Trustees, Hartshorn Family Trust, Helene Kenny / Bridget Kenny Revocable Trust, Wilhelmina M. Wieters Life Estate Childrens Trust, 33 Bogard Street LLC, 249 Cumming, LLC, 253 Coming Street LLC, 259 East Bay LLC, 259 East Bay 10 B LLC, 272 D Coming St. LLC, Café International, Inc., Corner At Old Canton, LLC, Geer Interests LLC, Kit Properties LLC, Lambert-Weiss LLC, The Naws LLC, New Lease Capital LLC, One Henrietta LLC, Periwinkle Partners, LLC, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC,

Defendants,

Of whom

Younesse Alami, Simon M. Adell, Matthew Anderson, Matthew Asher, Andre Bauer, Peter Bierce, Brandon Blount, Reginald P. Brown IV, Mary Cahill, Ryan Cockrell, Kevin and Virginia Conlon, Anne Marie Crevar, Darryl J Damico, Stephen Darwak, Lindsay Davenport, Mary Dickerson, Maxwell Streeter, Kathleen Dougherty, David Dressman, Lindsay Davenport, Kathleen Dougherty, David Dressman, Anna Dressman, Michael Elder, Christopher Scott Farley, Michele Ghastin, Ryan Gilreath, Sonya Gilreath, Kimberly Glenn, Shaun Halsor, Josephine Rex, Laura Hyatt, Nathan Herring, James Hicks Jr., Laurie Hicks, Preston G Hipp, Colin Jones, Matthew F. Jones, Robert C. Jones, Robin Joseph, Molly Keeler, John Kenny, Abigail King, Aaron Kless, Laurie Kramer, Robert Kramer, Allison Kreutzer, Jesse Lutz, Thomas Naselaris, Zoe Naselaris, Beau O'Steen, Cori O'Steen, Lance Parr, Brandon Perdue, Hadassah Rothenberg, Daniel Ryan, Kimberly Bowlin, Kevin Schnittker, Ginger Scofield, Alecia Stevens, Justin Swan, Merrick Teichman, John Van Vlack, Jr, William Waterhouse, Jennifer Waterhouse, Anne Wohlfeil, Bryan Young, Helene Kenny / Bridget Kenny Revocable Trust, 259 East Bay LLC, 259 East Bay 10 B LLC, Corner At Old Canton, LLC, Kit Properties LLC, The Naws LLC, One Henrietta LLC, Periwinkle Partners, LLC, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC are

Respondents.

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**APPELLANTS' INITIAL DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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Appellants propose the following be included in the Record on Appeal:

1. 12/16/16 Order
2. 8/6/18 Order
3. 11/26/17 Order at 3, 8, 9
4. 9/5/18 Order denying motion for reconsideration without a hearing
5. First Amended Complaint
6. 2/6/17 Answer and Counterclaims
7. 5/11/17 Transcr. p. 25
8. 6/7/18 Transcr. pp. 7-8, 12, 19, 28-31
9. 2/1/16 Transcr. pp. 5, 9, 11
10. 5/8/18 Transcr. p. 3,
11. 1/22/18 Transcr. pp. 8, 10
12. 1/12/18 Motion to Compel
13. 5/17/18 Motion to Compel Video-Taped depositions

14. Exhs. 1 and 2 to Plaintiffs' 5/7/18 memo opposing motions to dismiss
15. Holt Depo. pp. 51-53, 60, 62-63, 105, 112, 114-115, 117-118, 121, 131, 140, 167-172, 174, 180-181, 202-203, 220-221, 223-224, 246-247
16. Robert Holt Affidavits filed on October 28, 2016, May 9, 2017, June 4, 2018 with Exh. 1
17. City of Charleston Ordinances 7-122, 54-120, 904 and 54-905

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



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**ATTORNEY FOR APPELLANTS**

March 15, 2019

Charleston, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

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Case No. 15-CP-10-5415

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Appellants,

v.

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Respondents.

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that true and correct copies of the **Appellants' Initial Brief and the Appellants' Initial Designation of Matter** were served this 15<sup>TH</sup> day of March, 2019 upon:

**BY ELECTRONIC MAIL ONLY**

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March 15, 2018

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RECEIVED

MAR 18 2019

SC Court of Appeals

**Re: *Charleston Development Company, LLC, et. al. v. Younesse Alami, et al.***  
Appellate Case No.: 2018-001766

Dear Ms. Kitchings:

Enclosed for filing please find the Appellants' Initial Brief, Designation of Matter and Certificate of Service.

Sincerely,

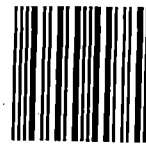
SEAN KEVIN TRUNDY, LLC

A handwritten signature in black ink, appearing to read "Sean K. Trundy", with a long horizontal flourish extending to the right.

Sean K. Trundy



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Charleston, SC 29407

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