

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

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM BEAUFORT COUNTY
Judge Marvin Dukes – Master In Equity

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MAR 19 2019

SC Court of Appeals

Appellate Case No. 2018-002170

Lower Case No. 2016-CP-07-01825

Steven Craig Molloy and Island Group, Inc.
d/b/a Carolina Cleaning

Plaintiffs

Of which Steven Craig Molloy is the

Appellant

vs.

Beaufort County Government;
Gary Kubic, Individually, and as Beaufort County Administrator;
Josh Gruber, Individually and as former Beaufort County In-House Attorney; Bryan Hill,
Individually and as former Beaufort County Deputy Administrator;
Shannon Loper, Individually and as employee of the Beaufort County Parks and Leisure;
Stu Rodman, as Finance Chair of Beaufort County Council; Dave Thomas, Procurement
Director Beaufort County, SC. Beaufort County Disabilities and Special Needs;
Beaufort County DSN Board

Respondents (Defendants)

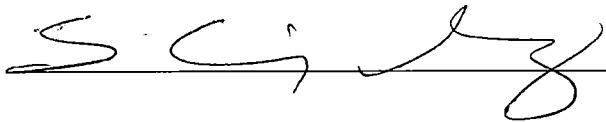
**DESIGNATION OF MATTER TO BE
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Appellant proposes and submits the following documents to be included in the Record on Appeal:

1. Summary Judgment (Defendants)
2. Order Granting Defense Motion for Summary Judgment
3. Order for Motion to Reconsider Judge Recusal / Venue
4. Answer to Plaintiffs Second Verified Amended Complaint
5. BC DSN Growth Rate Judge take Judicial Notice
6. BC DSN Ordinance take Judicial Notice
7. Memo in Opposition to Motion to Compel Answer & Motion to Amend
8. Affidavit Lauren Martel to Support Motion to Compel
9. Motion to Compel & Motion to Amend
10. Supplemental Memo In Support of Motion for Summary Judgment
11. Return in Opposition to Motion for Summary Judgment (Plaintiff)
12. 2010 Contract for Janitorial Services -2010 RFP Award to Appellant
13. August 8, 2011 Renewal Letter from Richard Hineline
14. Emails dated February 25,2013 from Mitzi Wagner and Bill Love, to Appellant
15. December 11, 2011 Confidential email from Appellant to Bryan Hill and Mark Roseneau
16. March 2012 RFP #0221 RFP due March, 23 2012
17. March 2012 RFP #0221 Submission of Appellant Bid dated March 22, 2012
18. March 2012 RFP #0221 Submission of BCDSN Bid dated June 18, 2012
19. Minutes from June 19, 2012 BCDSN Board Meeting, Executive Director Report, Page 3, Paragraph 1 and Minutes from April 21, 2013 BCDSN Board meeting Page two, 2nd Paragraph;
20. June 27 & 28, 2012 Email from Dave Thomas to Mitzi Wagner and Beaufort County employees
21. August 8-12, 2012 Emails between Dave Thomas and Alicia Holland, Shannon Loper and Beaufort County employees
22. August 13, 2012 Finance Committee Contract Award to Vendor DSN
September 28, 2012 Email between Mitzi Wagner and Shannon Loper and Beaufort County employees
23. December 2012 Emails between Beaufort County Employees
Dave Thomas and Mitzi Wagner, Alicia Holland, William (Bill) Love, Shannon Loper, Bryan Hill, Mark Roseneau.
24. Complaint Letters dated December 5, 2012, from Appellant to Dave Thomas and August 5, 2013 to Gary Kubic re: contract interference and problems
25. September 2014 FOIA Request to Beaufort County
26. All FOIA received by Appellant
27. Affidavit of Dave Thomas, Section "B": Page 3, Line 19; Page 4, lines 20-29

28. Affidavit of William Love April 6, 2017: Page 2, Lines 10-12; Page 3, Lines 13-21; Page 4, Lines 22-26; 1.; Page 6, Lines 36-38
29. Affidavit of Cynthia Bensch April 20, 2018, Beaufort County Councilwoman, 2012-2016
30. BCDSN Internal Documents, pages 1-2, for "*Employing Individuals with Developmental Disabilities*"
31. FLSA Narrative, US Department of Labor dated April 30, 2018
32. May 29, 2018 Letter from the Governor's Office, with referenced Ordinance #2011/29
33. 2011 Ordinance #2011/29 Changed by Beaufort County Council
34. 2017 SC Legislative Oversight Committee Report
35. Transcript of Proceedings March 23, 2018: Page 12, Lines 10-25; Page 13, Lines 10 - 25; Page 13 Line 21; Page 14, Lines 1-15; Page 16, Lines 20-25; Page 17, Lines 1-15; Page 21, Lines 3-25; Page 22, Lines 1-2 and 12-19; Page 25, Lines 15-25; Page 26, Lines 10-24; Page 27, Lines 23-25; Page 28, Lines 1-25; Page 29, Page 1-15; Page 30 Lines 15-17 and Lines 21-25.
36. Timeline of FOIA received by Appellant
37. FOIA received by Appellant
38. Beaufort County Purchasing Ordinance
39. Order from Judge Dukes dated November 27, 2018
40. Record of Pleadings

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

 date 3-13-19

Steven Craig Molloy - Pro Se' - Appellant
43 Big Woods Dr.
Hilton Head SC 29926
p: 843-368-7300

**FORM 7
PROOF OF SERVICE OF
DESIGNATION of MATTER**

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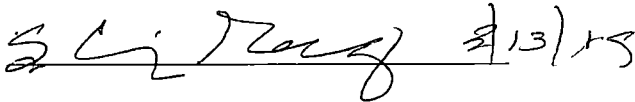
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PROOF OF SERVICE

I certify that I have served the Designation of Matter on Beaufort County and the other other named Respondents (Defendants) by depositing a copy in the United States mail, postage prepaid, on. March 13, 2019 addressed to their attorney's of record, John P. Fletcher, Dawes Cooke, Barnwell Whaley Attorney's, PO Box H, Charleston, SC 29402 and Tom Keaveny, Beaufort County Attorney ; PO Box 1128, Beaufort County, SC. 29901.

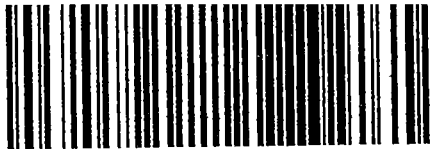
March 13, 2019



Appellant -
Steven Craig Molloy – Pro se'
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Attorney's for Respondents;
John P. Fletcher, Dawes Cooke
Barnwell Whaley Attorney's
PO Box H, Charleston, SC 29402
and Beaufort County Attorney
Tom Keaveny

Molloy
43 Big Woods
#17 SC 29926



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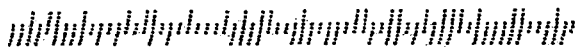
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P.O. Box 11629
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