

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
In the Court of Common Pleas for the Fourteenth Judicial Circuit

Hon. Marvin H. Dukes, III, Master in Equity

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Appellate Case No. 2018-002170

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

Of which Steven Craig Molloy is the ..... Appellant

v.

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SC Court of Appeals

Beaufort County; 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; and Dave Thomas, Procurement Director for Beaufort  
County, South Carolina; Disabilities and Special Needs (Non-  
Profit); and Beaufort County DSN Board..... Respondents

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**RESPONDENTS' DESIGNATION OF MATTER  
FOR INCLUSION IN THE RECORD ON APPEAL**

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M. Dawes Cooke, Jr., Esq.  
John W. Fletcher, Esq.  
BARNWELL WHALEY PATTERSON &  
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288 Meeting Street, Suite 200 (29401)29401  
P.O. Drawer H  
Charleston, SC 29402  
(843) 577-7700 Fax: (843) 577-7708  
*Counsel for Respondents*

**Other Parties/Counsel of Record:**

Steven Craig Molloy  
43 Big Woods Drive  
Hilton Head, SC 29926  
*Appellant*

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondents Beaufort County; 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; and Dave Thomas, Procurement Director for Beaufort County, South Carolina; Disabilities and Special Needs (Non-Profit); and Beaufort County DSN Board (collectively "Respondents") hereby designate the following materials to be included in the Record on Appeal in this matter in connection with their Respondents' Brief. Each item designated is to include all attachments or exhibits to the original of the referenced item. Respondents intend to designate each and every item from the record that they cited in their Initial Respondents' Brief in this matter. Respondents expressly reserve the right to seek supplementation of the record pursuant to Rules 209 and 212, SCACR. Respondents designate the following matters for inclusion in the Record on Appeal:

1. August 22, 2016 Plaintiffs' Summons and Verified Complaint (including any and all exhibits)
2. February 3, 2017 Form 4 Order granting Motion for a More Definite Statement)
3. February 15, 2017 Plaintiffs' Amended Verified Complaint and Summons (including any and all exhibits)
4. March 1, 2017 Defendants' Answer to Amended Complaint
5. March 15, 2017, Plaintiffs' Motion for Temporary Injunction and Temporary Restraining Order
6. April 6, 2017 Affidavit of Lieutenant Brian Baird in Opposition to Plaintiffs' Motion for Temporary Injunction and Temporary Restraining Order (including any and all exhibits)
7. April 6, 2017 Affidavit of Shannon Loper in Opposition to Plaintiffs' Motion for Temporary Injunction and Temporary Restraining Order (including any and all exhibits)

8. April 6, 2017 Affidavit of William Love in Opposition to Plaintiffs' Motion for Temporary Injunction and Temporary Restraining Order (including any and all exhibits)
9. April 7, 2017 Affidavit of Dave Thomas in Opposition to Plaintiffs' Motion for Temporary Injunction and Temporary Restraining Order (including any and all exhibits)
10. April 10, 2017 Affidavit of Alicia Holland in Opposition to Plaintiffs' Motion for Temporary Injunction and Temporary Restraining Order (including any and all exhibits)
11. April 17, 2017 Form 4 Order Denying Motion for Temporary Injunction and Temporary Restraining Order
12. May 2, 2017 Form 4 Order denying Motion for Reconsideration
13. July 21, 2017 Defendants' Notice of Motion and Motion for Summary Judgment (including any and all exhibits)
14. August 1, 2017 Plaintiffs' Return to Motion for Summary Judgment
15. December 4, 2017 Plaintiffs' Motion for Summary Judgment
16. February 25, 2018 Plaintiffs' Notice of Motion and Motion to Compel Answers to Discovery and Motion to Amend
17. June 5, 2018 second Verified Amended Complaint and Summons
18. June 6, 2018 Form 4 Order granting leave to file Second Amended Complaint
19. June 19, 2018 Defendants' Answer to Plaintiffs' (Second) Amended Verified Complaint
20. June 25, 2018 Defendants' Second Supplemental Memorandum in Support of Motion for Summary Judgment (including any and all exhibits)
21. November 27, 2018 Order Granting Defendants' Motion for Summary Judgment
22. December 10, 2018 Plaintiff Steven Craig Molloy's Notice of Appeal (including any and all exhibits)

Respondents certify, pursuant to S.C.A.C.R., Rule 209(c), that the designations set forth above are relevant to the appeal in this matter, and that they have not designated any matter that is irrelevant to the issues before the Court.

March 22, 2019

BARNWELL WHALEY PATTERSON &  
HELMS, LLC

By: 

M. Dawes Cooke, Jr.,  
John W. Fletcher, Esq.

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***Counsel for Respondents***

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Profit); and Beaufort County DSN Board, ..... Respondents

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I certify that I have served the Respondents Designation of Matter for Inclusion in the Record on Appeal on the above-referenced Appellant by depositing a copy of it in the United States Mail, postage prepaid, on March 28, 2019, addressed to him at the following address:

Steven Craig Molloy  
43 Big Woods Drive  
Hilton Head, SC 29926  
*Appellant*

BARNWELL WHALEY PATTERSON &  
HELMS, LLC

By: 

M. Dawes Cooke, Jr., Esq.

John W. Fletcher, Esq.

BARNWELL WHALEY PATTERSON &  
HELMS, LLC

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*Counsel for Respondents*

**BARNWELL  
WHALEY**

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Attorneys for businesses & professionals since 1938

John W. Fletcher, Esquire  
jfletcher@barnwell-whaley.com

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SC Court of Appeals

March 22, 2019

The Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RE: Steven Craig Molloy and Island Group, Inc. d/b/a Carolina Cleaning v. Beaufort County;  
Gary Kubic individually, and as Beaufort County Administrator; et al  
Appellate No. 2018-001569  
BWPH File No.: 1.626

Dear Ms. Kitchings:

Enclosed for filing are the original and one copy of each of the following:

- (1) Initial Brief of Respondents;
- (2) Respondents' Designation of Matter for Inclusion in the Record on Appeal; and
- (3) Proofs of Service.

Please file the originals and return clocked copies to me in the enclosed envelope.

By copy of this letter, I am serving a copy of the Initial Brief and Designation upon *pro se* Appellant.

Sincerely,



John W. Fletcher

JWF/jgc  
Enclosures

cc (w/enclosures): Steven Craig Molloy, *pro se* Appellant

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[www.barnwell-whaley.com](http://www.barnwell-whaley.com)

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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

**BARNWELL  
WHALEY** | **80** YEARS ■  
PATTERSON & HELMS LLC

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The Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201



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