

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Appellate Case No. 2019-000088

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

RECEIVED

MAY 17 2019

SC Court of Appeals

Edward Green,

Appellant,

v.

Mark Keel, Chief of the South Carolina  
Law Enforcement Division and the State  
of South Carolina,

Respondents.

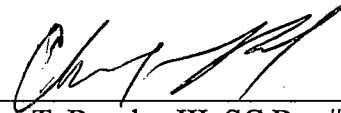
DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

1. Order for Destruction of Arrest Records filed March 20, 2016
2. Summons and Complaint for Declaratory Judgment;
3. Answer of Respondents (with Attachment);
4. Respondents'/Defendants' Motion for Summary Judgment;
5. Transcript of Record of Hearing on October 1, 2018, before the Honorable DeAndrea G. Benjamin; and

6. Order Granting Judgment on the Pleadings filed December 18,2018;

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



---

Charles T. Brooks, III, SC Bar # 11762  
Attorney for Appellant  
THE BROOKS LAW OFFICE, LLC  
309 Broad Street  
Post Office Box 3512  
Sumter, South Carolina 29151  
803-418-5708  
803-934-9618  
cbrooks@ctbrooks.com

May 14, 2019

**PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
DeAndrea G. Benjamin, Circuit Court Judge

Case No. 2019-000088

Edward L. Green,

Appellant,

v.

Mark Keel, Director South  
Carolina Law Enforcement  
Division (SLED) and the State  
of South Carolina,

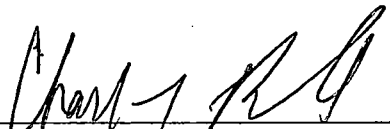
Respondent.

**RECEIVED**  
MAY 17 2019  
SC Court of Appeals

**PROOF OF SERVICE**

I certify that I have served the Initial Brief of Appellant and the Designation of Matter to be Included in the Record on Appeal, on Mark Keel, Director South Carolina Law Enforcement Division (SLED) by depositing a copy of it in the United States Mail, postage prepaid, on May 15, 2019, addressed to their attorneys of record, Adam L. Whitsett, Post Office Box 21398, Columbia, South Carolina 29221 and that I have served The State of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on April 16, 2019, addressed to their attorneys of record, Harley Kirkland, Post Office Box 11549, Columbia, South Carolina 29211.

May 15, 2019

  
\_\_\_\_\_  
Charles T. Brooks, III  
Post Office Box 3512  
Sumter, South Carolina 29151  
(803) 418-5708  
Attorney for Appellant

# The Brooks Law Office, LLC

---

**CHARLES T. BROOKS, III, ATTORNEY AT LAW**

**IRMA R. BROOKS, ATTORNEY AT LAW**

309 BROAD STREET ~ SUMTER, SOUTH CAROLINA 29150  
POST OFFICE BOX 3512 ~ SUMTER, SOUTH CAROLINA 29151  
(803) 418-5708

FAX: (803) 934-9618 TOLL FREE: (877) 770-8792

Email: [cbrooks@ctbrooks.com](mailto:cbrooks@ctbrooks.com)

May 15, 2019

**RECEIVED**

MAY 17 2019

SC Court of Appeals

South Carolina Court of Appeals  
ATTN: Clerk  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Edward L. Green vs. Mark Keel, Director for South Carolina Law Enforcement Division  
(SLED) and the State of South Carolina  
Appellate Case No.: 2019-000088

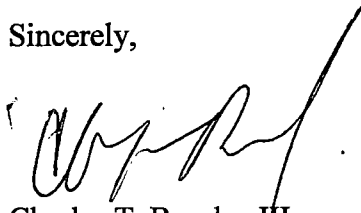
Dear Sir or Madam:

Enclosed herewith please find the Initial Brief of the Appellant as well as the Designation of Matter to be Included in the Record on Appeal as they relate to the above matter. Additionally, I am enclosing the Proof of Service for these pleadings.

If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,



Charles T. Brooks, III  
CTB,III/jlm

cc: Harley Kirkland, SCAG Office  
Adam Whitsett, SLED

Charles T Brooks III  
Attorney  
Brooks Law Offices, LLC  
Post Office Box 3512  
Sumter, South Carolina 29151

South Carolina Court of Appeals  
Jenny Abbott Kitchings  
Post Office Box 11629  
Columbia, South Carolina 29211

RECEIVED  
MAY 17 2012  
SC Court of Appeals