

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM WILLIAMSBURG COUNTY  
Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

Appellate Case No. 2019-000030  
Case No. 2015-CP-45-00401

RECEIVED

MAY 16 2019

SC Court of Appeals

Shawonder Scott, Appellant,

v.

Curtis McAlister, Acquana McAlister, Norma L. Cyrus, Tax Collector for Williamsburg County, the County of Williamsburg, an Unincorporated Subdivision of the State of South Carolina, Hartwell Pendergrass, Sr., and Hattie S. Pendergrass, Defendants,

Of whom Norma L. Cyrus, Tax Collector for Williamsburg County and the County of Williamsburg, an Unincorporated Subdivision of the State of South Carolina, are the Respondents.

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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

1. Appellant/Plaintiff's Summons and Complaint, filed August 5, 2015
2. Respondents/Defendants Answer, filed September 3, 2015
3. Respondents/Defendants Motion for Summary Judgment, filed June 28, 2018
4. Appellant/Plaintiff's Reply to Defendants Motion for Summary Judgment, filed July 7, 2018
5. Respondents/Defendants Motion to Amend Answer, filed July 9, 2018
6. Respondents/Defendants Memorandum in Support of Summary Judgment, filed July 9, 2018
7. Form 4 Order of the Honorable Clifton Newman, filed July 9, 2018
8. Order Pursuant to Defendants, Norma L. Cyrus and Williamsburg County, Motion for Summary Judgment of the Honorable George M. McFaddin, Jr., filed December 11,

2018

9. Deposition of Appellant/Plaintiff Shawonder Scott from January 12, 2018, pp. 20-27, 59 & 60-64
10. Deposition of Defendant Acquana McAlister from January 12, 2018, pp. 21 & 22
11. Deposition of Defendant Curtis McAlister from January 12, 2018, pp. 36 & 37
12. Deposition of Appellant/Defendant Norma L. Cyrus from April 5, 2018, p. 27
13. Transcript of Motions hearing from September 28, 2018, pp. 11, 12, 14, 18 & 19

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

Kingstree, SC  
May 13, 2019



W. Evan Reynolds, Esquire  
South Carolina Bar No. 102352  
W. E. Jenkinson, III, Esquire  
South Carolina Bar No. 2984

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**ATTORNEYS FOR THE RESPONDENTS**

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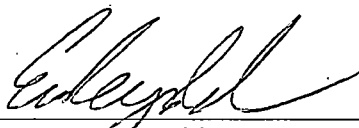
Of whom Norma L. Cyrus, Tax Collector for Williamsburg County and the County of Williamsburg, an Unincorporated Subdivision of the State of South Carolina, are the Respondents.

PROOF OF SERVICE

I certify that I have served the Initial Brief of the Respondent in the above referenced case, by depositing a copy of it in the United States Mail, postage prepaid, on May 14, 2019, addressed to:

Dwight C. Moore  
P.O. Box 1229  
Sumter, SC 29151-1229

May 14, 2019

  
W. Evan Reynolds  
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**Attorneys for the Respondents**



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W. E. Jenkinson, III  
Ernest J. Jarrett\*  
Jennifer R. Kellahan\*\*

J. Thomas Thompson  
William Evan Reynolds

May 14, 2019

\*Certified Family Court Mediator  
\*\*Certified Circuit Court Mediator

The Honorable Jenny Abbott Kitchings  
Clerk of Court S.C. Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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SC Court of Appeals

Re: Shawonder Scott v. Curtis McAlister, et al.  
Appellate Case Number 2019-000030

Dear Mrs. Kitchings:

Please find enclosed the following documents:

- 1) Original and one copy of the Initial Brief of the Respondents and Designation of Matter to be Included in the Record on Appeal in the above captioned case; and
- 2) Original and one copy of Proof of Service on opposing counsel.

Please file the original and mail the stamped copy back to my office using the enclosed self-addressed stamped envelope. By copy of this letter to opposing counsel, I am serving them with a copy of these documents.

We appreciate your continued cooperation.

With warm personal regards, I am

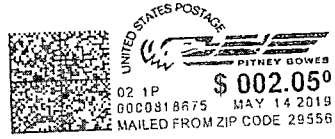
Very truly yours,

W. Evan Reynolds  
[evan@jenkinsonlaw.com](mailto:evan@jenkinsonlaw.com)

WER/

Enclosures: as stated

Pc: Dwight C. Moore, Esquire



Jenkinson, Jarrett & Kellahan, PA

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