

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 15-CP-10-5415

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SC Court of Appeals

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 Streater, 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 Harrel, 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 ICreutzer, 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, Indedit Singh, Avtar Singh, Alecia Stevens, Lee Stevens, Justin Swan, Merrick Teichman, John Van Vlack, Jr, William Waterhouse, Jennifer Waterhouse, Anne WohlTeil, Bryan Young, AJB Trust, Anthony & Jacqueline Bradley, Trustees, Tinhorn 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, Ulf, Porch Properties LLC, Westbury Properties, LLC, and Westendorff Hardware LLC,

Defendants,

Of whom

Yotmesse 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 Giheath, Kimberly Glenn, Shaun Halsor, Josephine Rex, Laura Hyatt, Nathan Herring, James Hicks Jr., Laurie Hicks, Preston G Hipp, Cohn 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 Bowfin, Kevin Schmittker, 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.

**RESPONDENTS' DESIGNATION OF MATTER
TO BE INCLUDED IN RECORD ON APPEAL**

Respondents propose the addition of:

1. **City of Charleston Zoning Ordinances 12-41 b.1.; 54-227; 54-202, 54-208; 54-220; Art. 2, Part 3 Table of Permitted Uses; 54-901; Appendix C.**
2. **Bob Holt Depo., pp. 9, 13, 56, 80, 101, 109, 113, 128, 130, 132, 150, 158, 160.**
3. **11-17-2016 Order**
4. **4-15-16 Order**
5. **6-14-16 Order**
6. **11-4-16 Order**
7. **6-7-18 Order**
8. **Defendants' Memorandum in Support of Motion for Summary Judgment**

to Appellant's Designation of Matter to be included in the Record on Appeal.

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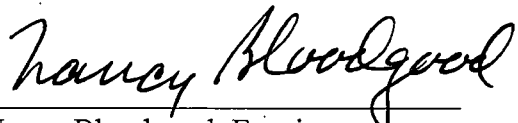
Stafford John McQuillan, III, Esquire
HAYNSWORTH SINKLER BOYD, PA
PO Box 340
Charleston, SC 29402
(843) 724-1120

Counsel for the Respondents

I hereby certify that on April 29, 2019 I served a copy of the Respondent's Initial Designation of Matter to the following:

Sean K. Trundy
Sean Kevin Trundy, LLC
1212 Wappoo Road
Charleston, SC 29407

by placing a copy of said documents in the United States mail with sufficient postage thereon on April 15, 2019 and again on April 29, 2019 (with a signature page included.)



Nancy Bloodgood, Esquire

Charleston, South Carolina

Date: April 29, 2019

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April 29, 2019

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

RE: *Charleston Development Co., LLC et al. v Younesse Alami et al.*
Appellate No.: 2018-001766
Case No.: 2015-CP-10-5415

Dear Ms. Kitchings,

Enclosed please find the original and one copy of a signed Respondent's Designation of Matter in connection with the above-referenced matter.

By copy of this letter to opposing counsel, I am likewise providing him with a copy of the same.

With kindest regards, I am,

Sincerely,

A handwritten signature in cursive script that reads 'Nancy Bloodgood'.

Nancy Bloodgood

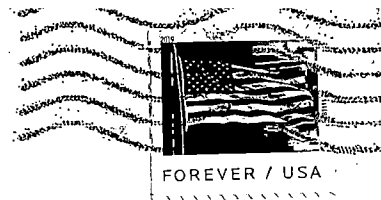
Enclosure

cc: Sean K. Trundy

Bloodgood & Sanders, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, S.C. 29464

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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