

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Hon. Eugene Griffith

Case No. 2018-CP-10-851
Appeal No. 2019-000728

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SC Court of Appeals

National Trust for Historic Preservation
In the United States and The City of Charleston, Appellants

v.

City of North Charleston,

Cross-Appellant / Respondent.

**Designation of Matter For Inclusion in Record On Appeal
(North Charleston Cross Appeal)**

Derk Van Raalte and Brady Hair
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Attorneys for the Cross-Appellant
City of North Charleston

Other Counsel of Record:

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Attorney for National Trust

Designation of Matters For Inclusion in Record On Appeal

North Charleston Annexation Ordinance 2017-080 regarding The Acre.

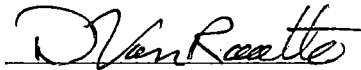
Order of Judge Eugene Griffith dated March 1, 2019 determining that opponents lack standing and further noting that, had standing existed, his ruling regarding contiguity / adjacency.

Order of Judge Eugene Griffith Denying Requested Reconsideration

Charleston County RMC Deed Records, Book S17, Page 224 (Plat showing access easement)

Charleston County RMC Deed Records Book 0-121, Page 206 (Actual Access Easement).

Respectfully submitted,



Derk Van Raalte

Brady Hair

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North Charleston, SC 29406

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Attorneys for the Cross-Appellant

City of North Charleston

This 18th day of June, 2019

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Hon. Eugene Griffith

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Appeal No. 2019-000728

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SC Court of Appeals

National Trust for Historic Preservation
In the United States and The City of Charleston, Appellant (City of Charleston)

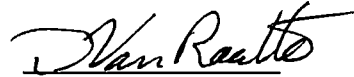
v.

City of North Charleston, Cross-Appellant / Respondent.

Certificate of Counsel (Record on Appeal)

The undersigned certifies that this Designation complies with Rule 209, SCACR.

June ~~18~~¹⁹, 2019.



Derk Van Raalte
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Attorneys for the Cross-Appellant
City of North Charleston

Certificate of Service

I certify that I have served the Appellants and the Hon. Jenny Abbott Kitchings by depositing a copy of the following documents:

Initial Brief of the Cross-Appellant City of North Charleston
Designation of Matters for Record on Appeal (Cross Appeal)
Certificate of Compliance for Designation of Matters for Record on Appeal
Certificate of Service

In the care of the United States Postal Service, postage prepaid, addressed either directly or to their respective attorneys of record as follows:

Hon. Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Other counsel of record:

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June 18, 2019



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Counsel for North Charleston

June 18, 2019

Hon. Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: National Trust and City of Charleston v. City of North Charleston
Case No. 2018-CP-10-851 (1 Acre Case)
Appeal No. 2019-000728

Initial Brief and Designation of Matter package

Dear Ms. Kitchings:

Please find enclosed for filing a copy of the City of North Charleston's Initial Brief and Designation of Matter regarding the above-referenced cross-appeal. Your assistance in filing this and returning appropriate copies to me would be greatly appreciated. For your convenience I am enclosing an appropriate self-addressed, stamped envelope. By copy of this letter I am simultaneously serving counsel for all related parties.

Sincerely,


Derk Van Raalte

Enclosures: North Charleston Initial Brief of Appellant (Cross Appeal)
North Charleston Designation of Matter for Record on Appeal (Cross Appeal)
Certificate of Compliance regarding Designation of Matter
Certificate of Service
SASE

cc: Bruce Miller
Trenholm Walker
Amy Wooten
Frances Cantwell
Daniel McQueeney
Keith Babcock
David Paavola

City of North Charleston

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