

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL from CHARLESTON COUNTY  
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

RECEIVED  
JUL 05 2019  
SC Court of Appeals

CASE NO. 2014-CP-10-04340  
Appellate Case No.: 2018-001089

Gwendolyn Brown, individually, and as natural guardian of Qunintez Lee Sapp, Deville Kiez Simmons, Haroldlett Uneke Simmons, and Glenn Simmons, Plaintiffs, Of Whom Gwendolyn Brown, , Deville Kiez Simmons, Haroldlett Uneke Simmons are the  
.....Appellants,

v.

Housing Authority of the City of Charleston, South  
Carolina.....Respondent

AMENDED DESIGNATION OF MATTER

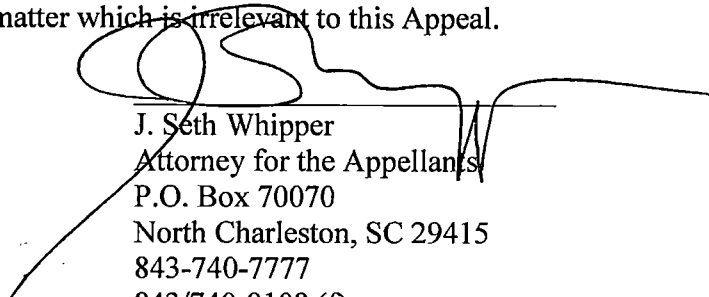
COMES NOW Appellants to propose the following as the Record on Appeal:

DESIGNATION OF MATTER

1. Summons and Complaint (8/4/2010)
2. Amended Summons and Complaint (8/ 17/ 2010)
3. Second Amended Summons and Complaint (8/16/2017)
4. Defendant's Motion for Summary Judgment (12/19/2016)
5. Order (5/7/2018): Granting Summary Judgment in-part ( Hon. Larry B. Hyman, Jr.)
6. Letter ( 10/14/2007) – Anne L. Peterson-Hutto, Esq.
7. Plaintiff's Memorandum Opposing Summary Judgment
8. Defendant's Memorandum Supporting Summary Judgment
9. Transcript (2/7/2018) Motion Hearing, (CP)

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

July 2, 2019



J. Seth Whipper  
Attorney for the Appellants  
P.O. Box 70070  
North Charleston, SC 29415  
843-740-7777  
843/740-9108 (f)

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Gwendolyn Brown, individually, and as natural guardian of Qunintez Lee Sapp, Deville Kiez  
Simmons, Haroldlett Uneke Simmons, and Glenn Simmons; Gwendolyn Brown, Haroldlett  
Uneke Simmons, Deville Kiez  
Simmons.....Appellant

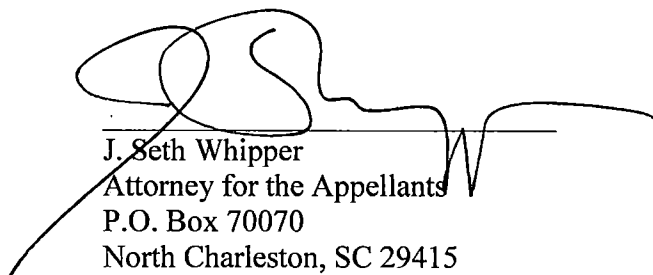
v.

Housing Authority of the City of Charleston, South  
Carolina.....Respondent

PROOF OF SERVICE

The undersigned hereby certifies that the true copy of the foregoing Appellants' Amended Initial  
Brief and Amended Designation of Matter has been served on the South Carolina Court of  
Appeals by depositing a copy to them in the United States Mail, postage prepaid, on July 2,  
2019, addressed to Clerk, South Carolina Court of Appeals, Post Office Box 11629, Columbia,  
South Carolina 29211 and served the same on: Mary Bass Lohr, Robert W. Achurch, III, and  
William H. Cox, III, Attorneys for Respondent, Post Office Box 40 Beaufort, SC 29901.

July 2, 2019

  
\_\_\_\_\_  
J. Seth Whipper  
Attorney for the Appellants  
P.O. Box 70070  
North Charleston, SC 29415  
843-740-7777

# WHIPPER LAW FIRM

*Attorneys and Counselors at Law*

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JUL 05 2019

SC Court of Appeals

CHERYL WHIPPER HAMILTON  
J. SETH WHIPPER

MAILING ADDRESS  
POST OFFICE BOX 70070  
NORTH CHARLESTON, SC 29415

July 2, 2019

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

**U.S MAIL ONLY**

Re: **Gwendolyn Brown, individually, and as natural guardian of Qunintez Lee Sapp, Deville Kiez Simmons, Haroldlett Uneke Simmons, and Glenn Simmons, Plaintiffs, Of whom Gwendolyn Brown, Deville Kiez Simmons Haroldlett Uneke Simmons are the Appellants v. Housing Authority of the City of Charleston, South Carolina, Respondent**  
**Appellate Case No.: 2018-001089**  
**Appellants' Amended Initial Brief- For Filing**  
**Amended Designation of Matter- For Filing**  
**Proof of Service- For Filing**

Dear Ms. Kitchings:

Find enclosed an original and one copy of the following: Appellants' Amended Initial Brief, Amended Designation of Matter, and the Proof of Service for the same. Find enclosed a self-addressed, stamped envelope for the return of all copies.

By copy of this letter, I am serving the same on Robert W. Archurch, III, Esq., William H. Cox, III, Esq. and Mary Bass Lohr, Esq., attorneys for Respondent.

Sincerely,  
WHIPPER LAW FIRM

J. Seth Whipper, Esquire

Enclosure

JSW/lds

xc: Robert W. Achurch, III, Esq.  
William Hewitt Cox, III, Esq.  
Mary Bass Lohr, Esq.



J. Seth Whipper, Esq.  
Whipper Law Firm  
P.O. Box 70070  
North Charleston, SC 29415

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JUL 05 2013  
SC Court of Appeals

The Hon. Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211-1629

