

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

RECEIVED

JUL 22 2019

Appellate Case No. 2019-000182

SC Court of Appeals

Donald Stanley and Sean Reiter,
Individually and as Class Representatives, Respondents,

v.

Southern States Police Benevolent Association, Inc.,Appellant.

**APPELLANT’S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

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

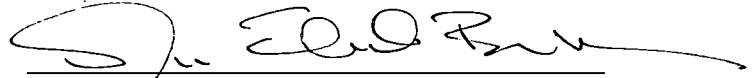
1. Complaint filed August 4, 2016
2. Amended Complaint filed November 22, 2016;
3. Deposition Transcript of Donald Stanley taken January 5, 2017 and all Exhibits;
4. The Southern States Police Benevolent Association, Inc.’s (“PBA”) Answer to the Amended Complaint filed January 23, 2017;
5. PBA’s Motion to Dismiss and Exhibits filed January 23, 2017;
6. Plaintiff’s Motion to Strike filed April 13, 2017;
7. PBA’s Memorandum in Support of Motion to Dismiss and all Exhibits filed April 21, 2017.
8. Plaintiff’s Memorandum in Opposition to PBA’s Motion to Dismiss and all Exhibits filed April 21, 2017.

9. PBA's Supplemental Memorandum in Support of Motion to Dismiss and all Exhibits filed April 25, 2017;
10. PBA's Memorandum in Opposition to Motion to Strike with all Exhibits filed May 8, 2017;
11. Plaintiff's Reply Memorandum in Support of Motion to Strike filed May 17, 2017;
12. Order Denying PBA's Motion to Dismiss filed July 31, 2017;
13. Order Denying's Plaintiff's Motion to Strike filed July 31, 2017;
14. Deposition Transcript of Sean Reiter and all Exhibits taken September 28, 2017;
15. PBA's Motion for Summary Judgment filed October 23, 2017;
16. Plaintiffs' Notice of Motion and Motion for Class Certification filed November 13, 2017;
17. PBA's Memorandum in Support of Its Motion for Summary Judgment and all exhibits dated November 8, 2017;
18. PBA's Memorandum in Opposition to Plaintiffs' Motion for Class Certification and all exhibits filed July 11, 2018;
19. Plaintiffs' Supplement to Motion for Class Certification filed July 12, 2018;
20. Order of the Honorable Edward W. Miller filed January 3, 2019;
21. PBA's Motion for Reconsideration of Class Certification Order and all Exhibits filed January 16, 2019; and
22. Order Denying Motion for Reconsideration filed January 28, 2019.

Pursuant to Rule 209(c), of the South Carolina Appellate Court Rules, the undersigned hereby certifies that the above designation contains no matter that is irrelevant to the appeal.

Submitted this _____ day of July, 2019.

July 22, 2019



James Edward Bradley, SC Bar #66130
Moore Taylor Law Firm, P.A.
P.O. Box 5709
West Columbia, SC 29171
(803) 796-9160

Kent T. Stair, SC Bar #14029
J. Patrick Norris, SC Bar #78270
J. Andrew Yoho, SC Bar #100803
Carlock, Copeland & Stair, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
(843) 266-8224

Barry Goheen, Esquire
Pro hac vice
FisherBroyles, LLP
4279 Roswell Road, Suite 208
Atlanta, GA 30342
(678) 592-9507

Attorneys for Appellant Southern States
Police Benevolent Association, Inc.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2016-CP-10-04062

RECEIVED

JUL 22 2019

SC Court of Appeals

Donald Stanley and Sean Reiter,
Individually and as Class Representatives, Respondents,

v.

Southern States Police Benevolent Association, Inc., Appellant.

PROOF OF SERVICE

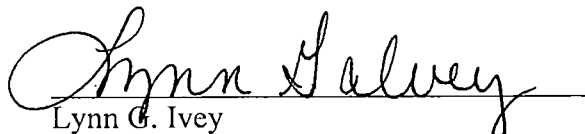
I, Lynn G. Ivey, an employee of the Moore Taylor Law Firm, P.A., certify that I have served the **Appellant's Initial Brief and Designation of Matter** by depositing copies of same in the United State Mail, postage prepaid, on July 22, 2019, addressed to the attorneys of record as follows:

Ronald L. Richter, Jr., Esquire
Scott M. Mongillo, Esquire
Peoples Building
18 Broad Street, Mezzanine
Charleston, SC 29401

Eric S. Bland, Esquire
P.O. Box 72
Columbia, SC 29202

Andrew J. Savage, III, Esquire
15 Prioleau Street
Charleston, SC 29401

Carl E. Pierce, II, Esquire
Joseph C. Wilson, IV, Esquire
Daniel Francis Lynch, IV, Esquire
P.O. Box 22437
Charleston, SC 29413


Lynn G. Ivey

West Columbia, South Carolina
July 22, 2019, 2019