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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2018-002166

RECEIVED
AUG 16 2019
SC Court of Appeals

Kevin M. Granatino.....Plaintiff/Appellant

v.

Calvin Williams, Clemson University, South Carolina
Department of Transportation, and Thrift Development Corporation.....Defendants

Of Whom:

South Carolina Department of Transportation and
Thrift Development Corporation.....Respondents.

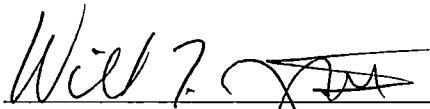
RESPONDENTS' MOTION TO STRIKE PORTIONS OF APPELLANT'S DESIGNATION
OF MATTER

Respondents, South Carolina Department of Transportation and Thrift Development Corporation hereby move to strike the following matter from the Appellant's Designation of Matter to be Included in the Record on Appeal:

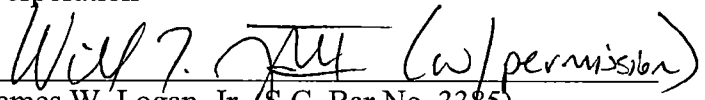
- a. Order Granting Petition to Appear Pro Hac Vice entered May 9, 2018;
- b. Application for Admission Pro Hac Vice filed February 5, 2018;
- c. Email Exchange between Mr. Marlette and Court dated February 5, 2018;
- d. Completion of Sponsorship Portion of Application for Admission Pro Hac Vice filed February 27, 2018;
- e. Completed Application for Admission Pro Hac Vice filed March 1, 2018;
- f. Email Exchange among Counsel and Court dated March 25, 2018;
- g. Notice of Appearance of Mr. Lewis filed April 25, 2018; and
- h. Notice of Appearance of Mr. Marlette filed May 14, 2018.

Pursuant to Rule 209, SCACR, parties are only permitted to include matter in a Designation which is relevant to the appeal. The above items are irrelevant to the appeal in this matter, as there are no issues surrounding Mr. Marlette's admission *pro hac vice* or Mr. Lewis's appearance in the matter. These items are not referenced in the statement of the case, statement of facts, or argument sections of Appellant's brief, and are only included as part of Appellant's "Concluding Statement" in which no law is cited and numerous assertions are made without any reference in the record to support them. Therefore, the above matter should be stricken from the Designation.

Respectfully submitted,



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August 14, 2019
Greenville, South Carolina

Attorneys for Respondent South Carolina
Department of Transportation

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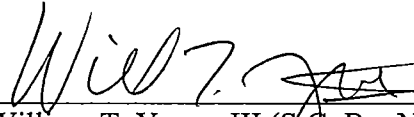
CERTIFICATE OF SERVICE

The undersigned counsel for Respondents does hereby certify that service of the **Respondents' Motion to Strike Portions of Appellant's Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United State Mail, first class postage prepaid, at the below addresses clearly indicated on said envelopes this the 14th day of August, 2019:

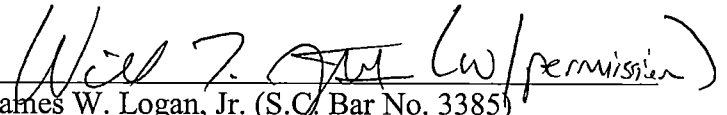
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August 14, 2019
Greenville, South Carolina

Attorneys for Respondent South Carolina
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August 14, 2019

The Honorable Jenny Abbott Kitchings
Clerk, The South Carolina Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

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Re: Kevin Granatino v. Calvin Williams
Appellate Case No. 2018-002166

Dear Ms. Kitchings:

Enclosed for filing with your office are the original and one (1) copy of the *Initial Brief of Respondents, Counterdesignation of Matter to Be Included in the Record on Appeal*, and *Certificate of Service* and the original and seven (7) copies of the *Respondents' Motion to Strike and Certificate of Service* in the above-referenced matter. I have also enclosed the filing fee of \$50.00. I would appreciate you filing the original and returning the clocked copies to me in the enclosed self-addressed stamped envelope. Your assistance is greatly appreciated.

With kind regards,

GALLIVAN, WHITE & BOYD, P.A.

William T. Young III / P15
William T. Young III

WTY/pls
Enclosure

cc: Stephen R.H. Lewis
George L. Marlette, III
Steven Edward Buckingham
James W. Logan, Jr.

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