

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

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Appellate Case No. 2019-000182  
Circuit Court Case No. 2016-CP-10-04062

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**RECEIVED**  
SEP 23 2019  
SC Court of Appeals

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

v.

Southern States Police Benevolent Association,  
Inc. Appellant.

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

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Respondents Donald Stanley and Sean Reiter propose the following be included in the  
Record on Appeal:

1. Plaintiff's Motion to Strike with all Exhibits;
2. Plaintiff's Reply Memorandum in Support of Motion to Strike with all Exhibits;
3. Plaintiffs' Memorandum in Opposition to Motion for Summary Judgment with all  
Exhibits;
4. Order Denying Defendant's Motion for Summary Judgment dated November 20,  
2017;
5. Transcript of Hearing on October 22, 2018;

6. Defendant's Answers to Plaintiff's Second Set of Interrogatories, including attachment to same (introduced at Hearing on October 22, 2018);

7. Plaintiffs' Memorandum in Opposition to Defendant's Motion to Reconsider Class Certification with all Exhibits.

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.

Respectfully submitted,

PIERCE, SLOAN, WILSON, KENNEDY &  
EARLY, LLC

By:



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*Attorneys for Respondents Donald Stanley and Sean  
Reiter, Individually and as Class Representatives*

Charleston, South Carolina  
September 20, 2019

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County

Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2019-000182  
Circuit Court Case No. 2016-CP-10-04062

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SEP 28 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, Carl E. Pierce, II, of Pierce, Sloan, Wilson, Kennedy & Early, LLC, counsel for Respondents Donald Stanley and Sean Reiter, Individually and as Class Representatives, hereby certify that the foregoing **RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on September 20, 2019, properly posted for delivery to the following addressees:

James Edward Bradley, Esq.  
Moore Taylor Law Firm, P.A.  
PO Box 5709  
West Columbia, SC 29171

*and*

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*Attorney for Appellant South States Police  
Benevolent Association, Inc.*

*Attorneys for Appellant  
South States Police Benevolent Association, Inc.*

Respectfully submitted,

PIERCE, SLOAN, WILSON, KENNEDY  
& EARLY, LLC

By:



Carl E. Pierce, II (SC BAR NO. 7946)  
*Attorney for Respondents Donald Stanley  
and Sean Reiter, Individually and as Class  
Representatives*

Charleston, South Carolina

Dated: 9/20/19

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County

Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2019-000182  
Circuit Court Case No. 2016-CP-10-04062

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

Respondents,

v.

Southern States Police Benevolent Association, Inc.

Appellant.

PROOF OF SERVICE

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SEP 23 2019  
SC Court of Appeals

I, Carl E. Pierce, II, of Pierce, Sloan, Wilson, Kennedy & Early, LLC, counsel for Respondents Donald Stanley and Sean Reiter, Individually and as Class Representatives, hereby certify that the foregoing **RESPONDENTS' INITIAL BRIEF** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on September 20, 2019, properly posted for delivery to the following addressees:

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Benevolent Association, Inc.*

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*Attorneys for Appellant  
South States Police Benevolent Association, Inc.*

Respectfully submitted,

PIERCE, SLOAN, WILSON, KENNEDY  
& EARLY, LLC

By:  \_\_\_\_\_

Carl E. Pierce, II (SC BAR NO. 7946)  
*Attorney for Respondents Donald Stanley  
and Sean Reiter, Individually and as Class  
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Charleston, South Carolina

Dated: 9/20/19

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September 20, 2019

**VIA U.S. MAIL**

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

Re: *Donald Stanley, Individually and as Class Representative v. Southern States  
Police Benevolent Association, Inc.*  
Circuit Court C/A No. 2016-CP-10-4062  
PSWKE File No.: P2765.00

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**SC Court of Appeals**

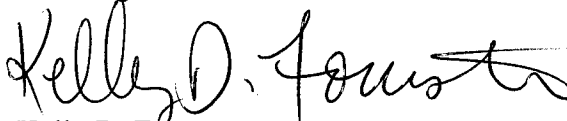
Dear Ms. Kitchings:

Enclosed for filing, please find the original and one (1) copy of the Respondents' Initial Brief as well as Respondents' Designation of Matter to be Included in the Record on Appeal in the above referenced matter. Please file the originals with the Court and return a clocked-in copy of each to our office via the enclosed envelope. Should you have any questions or concerns, please do not hesitate to contact our office.

Please feel free to contact me with any questions or concerns you may have.

With kind regards,

Sincerely,



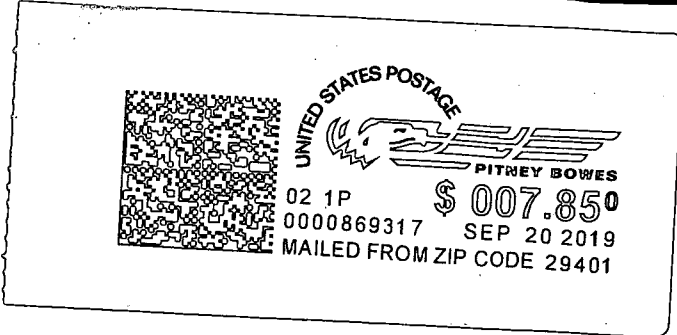
Kelly D. Forrester  
Paralegal to Joseph C. Wilson, IV

Enclosures

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The Honorable Jenny A. Kitchings  
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Columbia, SC 29201

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