

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-10-0846
Case No. 2018-CP-10-2131
Case No. 2018-CP-10-2539
Appeal No. 2019-000903

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SC Court of Appeals

The City of Charleston, Appellant

v.

City of North Charleston and Millbrook
Plantation, LLC, Respondents.

AND

Millbrook Plantation, LLC Plaintiff,

v.

City of Charleston Defendant

AND

City of Charleston Plaintiff

v.

City of North Charleston and Millbrook
Plantation, LLC, Defendants.

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

Derk Van Raalte and Brady Hair
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City of North Charleston

Other Counsel of Record:

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Bruce Miller, PA
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Charleston, SC 29412

Attorney for Millbrook Plantation

Designation of Matters For Inclusion in Record On Appeal

All items designated by any other party.

City of Charleston Ordinance 2-24.

City of Charleston Online Guidance re Annexations (<https://www.charleston-sc.gov/839/Annexation-Eligibility>)

City of Charleston Council Agenda for December 19, 2017.

City of North Charleston Ordinance 2017-83.

City of North Charleston Ordinance 2018-17.

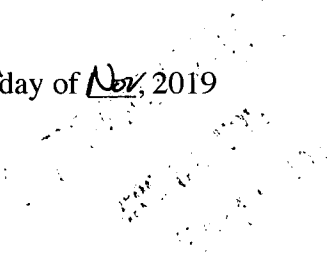
Respectfully submitted,



Derk Van Raalte
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Attorneys for the
City of North Charleston

This 4th day of Nov, 2019



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Hon. Eugene Griffith

Case No. 2018-CP-10-0846
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The City of Charleston,

Appellant

v.

City of North Charleston and Millbrook
Plantation, LLC,

Respondents.

AND

Millbrook Plantation, LLC

Plaintiff,

v.

City of Charleston

Defendant

AND

City of Charleston

Plaintiff

v.

City of North Charleston and Millbrook
Plantation, LLC,

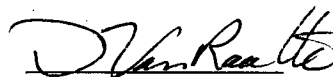
Defendants.

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Certificate of Counsel (Record on Appeal)

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

Nov 4, 2019.



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Attorney for the
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 Respondent City of North Charleston
Designation of Matters for Record on Appeal (Respondent North Charleston)
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:

Frances Cantwell
Daniel McQueeney
Frances Cantwell
City of Charleston Legal Dept
50 Broad Street
Charleston, SC 29401

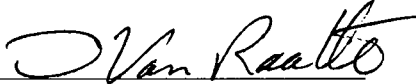
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Attorney for Millbrook

November 4, 2019


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SC Court of Appeals

November 4, 2019


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

Re: City of Charleston v. City of North Charleston and Millbrook
Case No. 2018-CP-10-846
2018-CP-10-2131
2018-CP-10-2539
Appeal No. 2019-000903

Respondent North Charleston's 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's Initial Brief of Respondent
North Charleston' Designation of Matter for Record on Appeal (Resp.)
Certificate of Compliance regarding Designation of Matter
Certificate of Service
SASE

cc: Susan Herdina, Esquire
Daniel "Chip" McQueeney, Esquire
Frances Cantwell, Esquire
Brady Hair, Esquire
Bruce Miller, Esquire

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Hon. Jenny Abbott Kitchings
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