

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Eugene C. Griffith, Jr., Circuit Court Judge

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SC Court of Appeals

Case No.: 2018-CP-10-851
Appellant Case No. 19-000728

National Trust for Historic Preservation in the United States and
City of Charleston, Respondents/Appellants,

v.

City of North Charleston..... Cross-Appellant/Respondent.

DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent/Appellant National Trust for Historic Preservation in the United States
("Respondent/Appellant" or "National Trust," and together with the Respondent/Appellant City
of Charleston, the "Respondents/Appellants") proposes the following be included in the Record
on Appeal:

Orders

1. Order filed March 1, 2019;
2. Order re-filed on March 5, 2019;
3. Order Denying Motion to Reconsider, Alter or Amend filed May 1, 2019;

Pleadings

4. National Trust Notice of Intent filed February 16, 2018;
5. Respondents/Appellants' Summons & Complaint filed March 20, 2018;
6. North Charleston's Answer, Affirmative Defenses & Countercls. filed April 17, 2018;
7. City of Charleston's Reply to North Charleston's Countercls. filed May 17, 2018;
8. National Trust's Reply to North Charleston's Countercls. filed May 21, 2018;

9. Whitfield's Answer and First Amended Counterclaim in Circuit Court Case No. 2018-CP-10-0848;

Motions, Memoranda, and Proposed Orders

10. North Charleston's Motion to Dismiss filed on October 9, 2018;
11. North Charleston's Motion for Partial Summary Judgment filed on October 9, 2018;
12. Affidavit of Adam McConnell filed by North Charleston;
13. Respondents/Appellants' Motion for Summary Judgment filed November 9, 2018;
14. Affidavit of Daniel C. Forsberg filed December 10, 2018;
15. National Trust's Mem. in Opposition to Motion to Dismiss filed on December 10, 2018;
16. City of Charleston's Mem. in Opposition to Motion to Dismiss filed on December 10, 2018;
17. Respondents/Appellants' Consolidated Mem. on Summary Judgment Motions filed on December 10, 2018;
18. National Trust's Motion to Reconsider, Alter or Amend filed on March 15, 2019;
19. City of Charleston's Motion to Reconsider, Alter, or Amend filed on March 14, 2019;

Transcripts & Exhibits

20. Transcript of December 10, 2018 hearing;

Notice of Appeals

21. City of Charleston's Notice of Appeal filed on May 28, 2019;
22. National Trust's Notice of Appeal filed on June 4, 2019;

Other

23. Ordinance No. 2017-080 adopted by North Charleston on December 21, 2017.

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

November 15, 2019



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v.

City of North Charleston Appellant/Respondent.


PROOF OF SERVICE

I certify that I have served the **Respondent/Appellant National Trust For Historic Preservation In The United States' Initial Brief and Designation of Matter** by depositing a copy in the United States Mail, postage prepaid, on November 15, 2019, addressed to the attorneys of record:

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November 15, 2019

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

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Re: National Trust & City of Charleston v. City of North Charleston
Appellate Case No. 2019-000728
WGFL File No. : 8081.001

Dear Ms. Kitchings:

Enclosed please find the Respondent/Appellant National Trust's Initial Brief, Designation of Matter, and Proof of Service.

Thank you for filing the enclosures with the Court. With kind regards, I am,

Sincerely yours,

WALKER, GRESSETTE, FREEMAN, & LINTON, LLC

G. Trenholm Walker

Enclosures (As Stated)

c: J. Brady Hair, Esq.
Derk Van Raalte, Esq.
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