

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
L. Casey Manning, Circuit Court Judge

Appellate Case No. 2019-001224
Case No. 2018-CP-40-5641

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DEC 09 2019
SC Court of Appeals

Ronald I. Paul, Appellant,

v.

South Carolina Department of Transportation; Paul D. de Holczer, individually and as a partner of the law firm of Moses, Koon & Brackett, PC; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormond, Jr., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plante & Garner; Oscar K. Rucker, in his individual capacity as Director, Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as Assistant Chief Counsel, South Carolina Department of Transportation, Respondents.

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


The Respondents South Carolina Department of Transportation; Paul D. de Holczer, Oscar K. Rucker, Macie M. Gresham, and Natalie J. Moore proposes that the following be included in the Record on Appeal:

- (1) Order issued by Judge L. Casey Manning filed June 7, 2019
- (2) Order Denying Motion to Reconsider issued by Judge L. Casey Manning filed June 28, 2019
- (3) Order Granting Motions to Dismiss issued by Judge Jocelyn Newman Filed November 13, 2019
- (4) Complaint filed October 26, 2018
- (5) Motion for Entry of Default and Default Judgment by the Appellant filed December 31, 2018 (with all attachment)
- (6) Motion to Set Aside Entry of Default and Motion to Dismiss by the Respondents Rucker and Gresham filed January 31, 2019
- (7) Affidavit of Sherrie K. Morey, filed January 31, 2019
- (8) Affidavit of Oscar K. Rucker, filed January 31, 2019
- (9) Motion to Dismiss and/or Motion for Summary Judgment filed by Defendants SCDOT, DeHolczer and Moore, filed November 26, 2018
- (10) Memorandum in Support of Motion to Dismiss and/or Motion for Summary Judgment filed by Defendants SCDOT, DeHolczer and Moore, filed February 6, 2019
- (11) Defendants Michael Quinn and Quinn Law Firm's Memorandum in Support of Motion to Dismiss, filed January 31, 2019 (with all attachments)
- (12) Plaintiff's Motion for Reconsideration, filed June 14, 2019 (with all attachments)
- (13) Transcript of Hearing, April 16, 2019

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

Respectfully submitted,

LINDEMANN, DAVIS & HUGHES P.A.

BY: 

ANDREW F. LINDEMANN #13030
5 Calendar Court, Suite 202
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*Counsel for Respondents South Carolina
Department of Transportation; Paul D. de
Holczér, Oscar K. Rucker, Macie M.
Gresham, and Natalie J. Moore*

December 6, 2019

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CERTIFICATE OF SERVICE

The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Respondents South Carolina Department of Transportation; Paul D. de Holczer, Oscar K. Rucker, Macie M. Gresham, and Natalie J. Moore, does hereby

certify that service of the **Initial Brief of Respondents** and **Respondents' Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon the *pro se* Appellant and all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 6th day of December 2019:

Mr. Ronald I. Paul
Post Office Box 4353
Columbia, South Carolina 29240

Michael H. Quinn, Esquire
Quinn Law Firm, LLC
Post Office Box 6903
Columbia, South Carolina 29260

J. Charles Ormond, Jr., Esquire
Ormond - Dunn
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December 6, 2019

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The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Ronald I. Paul v. South Carolina Department of Transportations; Paul D. de Holczer, individually and as a partner of the law firm of Moses, Koon & Brackett, PC; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormond, Jr. individually and as partner of the Law Finn of Holler, Dennis, Corbett, Ormond, Plante & Garner; Oscar K. Rucker, in his individual capacity as Director, Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as Assistant Chief Counsel, South Carolina Department of Transportation
Court of Appeals Case Number: 2019-001224
Civil Action Number: 2018-CP-40-5641
Our File Number: 79.20087

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Dear Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the **Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me in the enclosed envelope. By copy of this letter, I am serving copies on the *pro se* Appellant and all other counsel of record.

Thank you for your assistance in this matter. If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
December 6, 2019
Page Two

cc: (w/ Enclosures)

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