

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESON COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

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

RECEIVED

DEC 12 2019

SC Court of Appeals

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 TO BE INCLUDED IN THE RECORD ON APPEAL FOR
MILLBROOK PLANTATION, LLC**

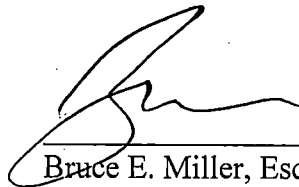
Respondent, Millbrook Plantation, proposes the following be included in the Record on

Appeal:

Designation of Matters for Inclusion in Record on Appeal

1. All items designated by any other party;
2. City of Charleston Ordinance 2005 – 093; and
3. Petition for annexation accepted by Charleston on December 19, 2017, which petition Charleston alleges included Millbrook parcel.

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



Bruce E. Miller, Esq. (SC Bar No. 3980)

BRUCE E. MILLER, P.A.

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**ATTORNEY FOR RESPONDENT
MILLBROOK PLANTATION, LLC**

December 9, 2019

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Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

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City of Charleston, Appellant,

v.

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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.

PROOF OF SERVICE

I certify that I have served Respondent's, Millbrook Plantation, initial brief and designation of matter on Appellant, City of Charleston, by depositing a copy of it in the U.S. Mail, postage prepaid on December 9, 2019, addressed to its attorneys of record as follows:

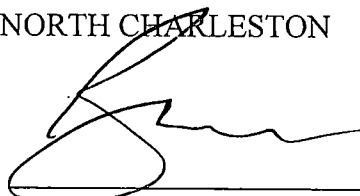
Frances I. Cantwell, Esq. (SC Bar No. 1121)
Daniel S. McQueeney, Jr., Esq. (SC Bar No. 6802)
Susan Herdina, Esq. (SC Bar No. 13165)
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cantwellf@charleston-sc.gov
mcqueeneyd@charleston-sc.gov
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ATTORNEYS FOR THE CITY OF CHARLESTON

I also certify that I have served Respondent's, Millbrook Plantation, initial brief and designation of matter on Respondent, City of North Charleston, by depositing a copy of it in the U.S. Mail, postage prepaid on December 9, 2019, addressed to its attorneys of record as follows:

J. Brady Hair, Esq. (SC Bar No. 9040)
Derk Van Raalte IV, Esq. (SC Bar No. 9286)
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**ATTORNEY FOR RESPONDENT
MILLBROOK PLANTATION, LLC**

December 9, 2019

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December 9, 2019

VIA U.S. MAIL

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

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SC Court of Appeals

Re: *City of Charleston v. City of North Charleston and Millbrook Plantation, LLC*
Appellate Case No. 2019-000903
BEM File No. 5021.001

Dear Ms. Kitchings:

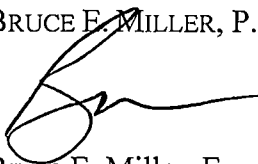
Enclosed please find one (1) original and one (1) copy of Respondent's, Millbrook Plantation, Initial Brief, Designation of Matter to be included on the Record, and Proof of Service. Kindly file the original and date-stamp the copy to be returned via the self-addressed, stamped envelope provided.

By copy of this letter, all counsel of record are served.

Thanking you for your courtesies.

Respectfully,

BRUCE E. MILLER, P.A.



Bruce E. Miller, Esq.

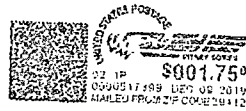
BEM/ccm

Hon. Jenny Abbott Kitchings
December 9, 2019
Page 2

Enclosures

cc (via U.S. Mail, w/encl): Frances I. Cantwell, Esq.
Daniel S. McQueeney, Jr., Esq.
J. Brady Hair, Esq.
Derk Van Raalte IV, Esq.

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