

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

RECEIVED

DEC 27 2019

SC Court of Appeals

APPELLATE CASE NO.: 2019-001255

Wendy Reed..... Appellants,

v.

Dorchester County and Thomas Limehouse..... Respondents.

**RESPONDENT DORCHESTER COUNTY'S DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

Jonathan J. Anderson
SC Bar # 383
Anderson Reynolds & Stephens, LLC
37 ½ Broad Street
P.O. Box 87
Charleston, SC 29401
(843) 723-0185 –phone
*Attorney for Respondent Dorchester
County*

December 23, 2019

TO: HONORABLE JUUDGES OF THE SOUTH CAROLINA COURT OF APPELS

COMES NOW, the Respondent Dorchester County pursuant to Rule 209 of the South Carolina Appellate Court Rules who hereby designates the parts of the transcripts, Orders, pleadings, exhibits, and/or other materials which Respondent Dorchester County proposes to include in the Record on Appeal.

PORTIONS OF THE TRANSCRIPT

Trial transcript of March 12, 2018 (incorrectly dated March 9, 2019): Pages 8-18, 21-39, 41-45, 47-52, 57-59, 69-74, 76, 78-79

ORDERS.

1. July 31, 2014 Order of Dismissal Federal Court, Civil Action No. 2:14-CV-00076
2. March 10, 2015 Amended Order on Respondent's Motion to Dismiss
3. May 17, 2017 Order Denying Plaintiff's Motion for Summary Judgment And Denying In Part and Granting In Part Defendant's Motions for Summary Judgment
4. July 2, 2019 Final Order

PLEADINGS

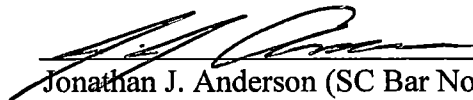
1. Complaint Federal Case Civil Action No. 2:14-CV-00076
2. Amended Complaint Federal Case Civil Action No. 2:14-CV-00076
3. Complaint
4. Answer
5. Amended Complaint
6. Answer to Amended Complaint
7. Plaintiff's Memorandum in Support to Motion for Summary Judgment
8. Defendant's Motion and Memorandum for Summary Judgment

EXHIBITS AND OTHER MATERIALS

1. October 29, 2014 Title to Real Estate Purchased at Tax Sale
2. Trial Exhibits: Plaintiff's 3, Defendant's 2 and 3.

I, Jonathan J. Anderson, hereby certify pursuant Rule 209(c), SCACR, the Designation of Matters to be included in the Record on Appeal submitted by Respondent Dorchester County does not contain matters and or items which are not relevant to this appeal.

ANDERSON REYNOLDS & STEPHENS, LLC



Jonathan J. Anderson (SC Bar No. 383)

37 ½ Broad Street

P.O. Box 87

Charleston, SC 29401

(843) 723-0185 –phone

(843) 405-0313 –fax

janderson@arslawsc.com

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

APPELLATE CASE NO.: 2019-001255

RECEIVED
DEC 27 2019
SC Court of Appeals

Wendy Reed..... Appellant,

v.

Dorchester County and Thomas Limehouse..... Respondents.

**RESPONDENT DORCHESTER COUNTY'S PROOF OF SERVICE OF DESIGNATION
OF MATTER TO BE INCLUDED IN RECORD ON APPEAL**

I hereby certify that on December 23, 2019, I served a copy of Respondent's Designation of Matters on the following:


Nancy Bloodgood, Esquire
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464
Attorney for Appellant

And

Thomas Limehouse
PO Box 2005
Summerville, SC 29848
Pro Se Defendant

by placing a copy of said documents in the United States mail with sufficient postage thereon.

ANDERSON REYNOLDS & STEPHENS, LLC



Felicity Moore, Paralegal
37 ½ Broad Street
P.O. Box 87
Charleston, SC 29401
(843) 723-0185 -phone

December 23, 2019
Charleston, South Carolina

ANDERSON REYNOLDS & STEPHENS, LLC

ATTORNEYS AT LAW
37 ½ BROAD STREET
POST OFFICE BOX 87
CHARLESTON, SOUTH CAROLINA 29402

JONATHAN J. ANDERSON
LISA A. REYNOLDS
SHANNA MILCETICH STEPHENS
W. COLEMAN LAWRIMORE
JONATHAN L. ANDERSON

TEL. 843-723-0185
FAX. 843-405-0313
E-MAIL: JANDERSON@ARSLAWSC.COM

December 23, 2019

VIA US MAIL

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

RECEIVED
DEC 27 2019
SC Court of Appeals

RE: Wendy Reed v. County of Dorchester and Thomas Limehouse
Appellate Case Number: 2019-001255

Dear Ms. Kitchings:

Please find enclosed the originals and one (1) copy each of the following:

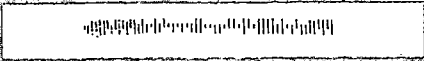
- 1) Respondent Dorchester County's Designation of Matter to be included in the Record on Appeal;
- 2) Proof of Service of Respondent's Designation of Matter to be included in the Record on Appeal;
- 3) Respondent Dorchester County's Initial Brief; and
- 4) Proof of Service of Respondent's Initial Brief.

Please contact me if you require additional information at this time. I am

Sincerely yours,


J.J. Anderson

JJA/fjm
Enclosures



ANDERSON REYNOLDS & STEPHENS, LLC
37 1/2 Broad Street
Post Office Box 87
Charleston, S.C. 29402

RECEIVED
DEC 27 2019
SC Court of Appeals

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

