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May 21 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ADMINISTRATIVE LAW COURT  
The Honorable H. W. Funderburk, Jr., Administrative Law Judge

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Case No. 2019-ALJ-17-0016-CC  
Appellate Case No. 2019-002049

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Kristiane M. Shirer,

Respondent,

vs.

Calhoun County Assessor,

Appellant.

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

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Respondent hereby designates the following matter to be included in the Record on Appeal:

1. Deed from Michael P. Shirer to Kristiane M. Shirer (Book 142 at Page 241);
2. Plat 920 in the Office of the Calhoun County Clerk of Court;
3. Respondent's March 21, 2018 Letter to Appellant;
4. Respondent's October 18, 2018 Denial Letter;
5. Appellant's October 19, 2018 Refund Denial Letter;
6. Respondent's November 13, 2018 Appeal Letter;
7. Written Decision by the Calhoun County Board of Assessment Appeals dated December 21, 2018;
8. Respondent's Request for Contested Hearing before ALC dated January 18, 2019;
9. Appellant's Prehearing Statement filed April 22, 2019;
10. Respondent's Prehearing Statement filed April 22, 2019;

11. Final Order dated October 10, 2019;
12. Motion to Reconsider filed October 25, 2019;
13. Order Denying Motion to Reconsider dated November 18, 2019;
14. Notice of Appeal filed December 17, 2019; and
15. Transcript of September 18, 20 19 Hearing (pp. 1–144) with exhibits.

Rule 209(c), SCACR Certification

I certify the foregoing Designation of Matter to be included in the Record on Appeal contains no matter that is irrelevant to this appeal.

*s/ Harry A. Dixon*

Andrew C. English, III, SC Bar #15925  
Harry A. Dixon, SC Bar #103509  
**CALLISON TIGHE & ROBINSON, LLC**  
1812 Lincoln Street, Suite #200  
P. O. Box 1390  
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Bates N. Felder, SC Bar #15877  
**THE FELDER FIRM, LLP**  
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Kristiane M. Shirer,

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Appellant.

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**PROOF OF SERVICE**

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I hereby certify that I have caused **Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal** to be served on Appellant's counsel via AIS email, pursuant to Supreme Court Order dated March 20, 2020, addressed as follows:

Robert E. Tyson, Jr., Esquire  
Benjamin R. Gooding, Esquire  
Robinson Gray Stepp & Laffitte, LLC  
1310 Gadsden Street  
P. O. Box 11449  
Columbia, SC 29211  
Email: [rtyson@robinsongray.com](mailto:rtyson@robinsongray.com)  
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(Attorneys for Appellant)

Charles D. Rhodes, Esquire  
Pope Flynn Group  
1411 Gervais Street, Suite #300  
Columbia, SC 29201  
Email: [cdrhodes@popeflynn.com](mailto:cdrhodes@popeflynn.com)  
(Attorneys for Appellant)

A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

s/ Harry A. Dixon

Andrew C. English, III, SC Bar #15925

Harry A. Dixon, SC Bar #103509

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*Attorneys for Respondent Kristiane M.  
Shirer*

May 20, 2020

## Kathy Romero

---

**From:** Kathy Romero  
**Sent:** Wednesday, May 20, 2020 5:44 PM  
**To:** Benjamin Gooding; Rob Tyson; cdrhodes@popeflynn.com  
**Cc:** batesfelder@sc.rr.com; Cynthia D. Nygord; Andrew English; Harry Dixon  
**Subject:** Shirer v. Calhoun County Assessor / Appellate Case No. 2019-002049  
**Attachments:** Initial Respondent's Brief (TO FILE).pdf; DOM - final.pdf; Proof of Service - Respondent's Initial Brief & DOM.pdf; Clerk.003.pdf

Dear Counsel,

Attached please find the Respondent's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service in the above-referenced matter, which are being filed with the SC Court of Appeals today. Pursuant to section (g)(3) of Order No. 2020-03-20-01 issued by The Supreme Court of South Carolina (RE: Operation of the Appellate Courts During the Coronavirus Emergency), the attached documents are being served upon you via email only. Thank you.

With kind regards,

Kathy Romero  
Legal Assistant to Harry A. Dixon, Esq.  
Callison Tighe & Robinson, LLC  
1812 Lincoln Street, Suite #200  
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**SC Court of Appeals**

**VIA EMAIL: [ctappfilings@uscourts.org](mailto:ctappfilings@uscourts.org)**  
**& U.S. MAIL**

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

RE: Kristiane M. Shirer vs. Calhoun County Assessor  
Case No. 2019-ALJ-17-0016-CC  
Appellate Case No. 2019-002049

Dear Ms. Kitchings:

Enclosed herewith please find an original and one (1) copy each of Respondent's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned in the envelope provided.

The enclosed documents have also been forwarded to your office and served upon Appellant's counsel today via email.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

*s/ Harry A. Dixon*

Harry A. Dixon

HAD:ksr  
Enclosures  
cc (via email): Robert E. Tyson, Jr., Esquire  
Benjamin R. Gooding, Esquire  
Charles D. Rhodes, Esquire  
Bates M. Felder, Esquire  
Andrew C. English, III, Esquire

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