

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
THE HONORABLE JOCELYN NEWMAN

Circuit Court Judge  
Fifth Judicial Circuit

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Appellate Case No. 2019-002076  
CASE NO: 2018-CP-400-5641

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**RECEIVED**  
NOV 12 2020  
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.

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

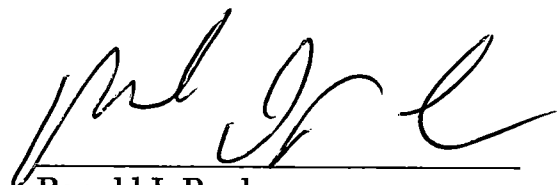
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Appellant proposes the following be included in the Record on Appeal:

1. Summons and Complaint filed on October 26, 2018;

2. Plaintiff's combined memorandum in opposition to all Defendant's Motion to Dismiss and/or Motion for Summary Judgment filed on February 11, 2019 (with all attachments);
3. Mediation Status update: from Mr. Osborne Eugene Powell, the court appointed mediator, filed on July 10, 2019.
4. Order: Scheduling Order filed July 20, 2019;
5. Plaintiff's first amendment to Plaintiff's combined memorandum in opposition to all Defendant's Motion to Dismiss and/or Motion for Summary Judgment filed on August 5, 2019 (with all attachments);
6. Order: Form 4 Order Granting Motions to Dismiss and Summary Judgment issued by Judge Jocelyn Newman, filed August 9, 2019;
7. Order: Formal Order granting Motions to Dismiss issued by Judge Jocelyn Newman, filed November 13, 2019;
8. Motion for Reconsideration filed on November 25, 2019 (with all attachments);
9. Order: Form 4 Order denying Motion to Reconsider filed on November 26, 2019;
10. Transcript of Record: Hearing held on August 8, 2019, before the Honorable Jocelyn Newman.

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



Ronald I. Paul  
Post Office Box 4353  
Columbia, S.C. 29240  
Appellant, *Pro Se* litigant  
(803) 414-2305

Columbia, South Carolina  
November 12, 2020

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RONALD I. PAUL.....Appellant,

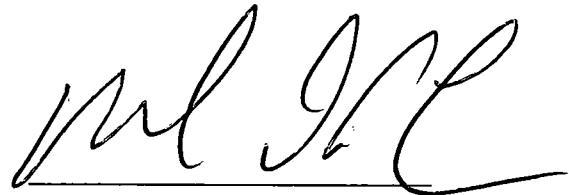
V.

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.

**PROOF OF SERVICE**

I, Ronald I. Paul hereby certify that I have served a copy of the **Initial Brief of Appellant and Designation of Matter to be included in the record on appeal** on all Respondents South Carolina Department of Transportation; Paul D. de Holczer individually, and as a partner of the law Firm of Moses, Koon & Brackett, P.C; 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, Plant & 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 by depositing a copy of it in the United State Mail, postage prepaid, on this date, November 12, 2020, addressed to the attorney of record or *Pro Se* Litigants and others as listed below.



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Appellant, *Pro Se* Litigant

November 12, 2020.

Columbia, South Carolina

RESPONDENTS COUNSEL OF RECORD

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court,  
South Carolina Court of Appeals  
1220 Senate St.  
Columbia, SC 29201