

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**Feb 19 2021**

**SC Court of Appeals**

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Carmen T. Mullen

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Appeal Court Number: 2020-001522  
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Town of Hilton Head Island, South Carolina,  
John J. McCann and Stephen G. Riley..... Intervenor/Plaintiffs  
v.  
Beaufort County, South Carolina, ..... Respondent  
v.  
James Beckert, in his official capacity as the Beaufort Co. Auditor, ..... Appellant

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APPELLANT’S DESIGNATION OF  
MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL  
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Appellant proposes that the following be included in the Record on Appeal:

1. Order Granting Temporary Injunction As To The Rual and Critical Lands Debt Service Millage Rate
2. Order to Consolidate
3. Summons and Complaint; 2020-CP-07-01840
4. Summons and Complaint In Mandamus; 2020-CP-07-01850
5. Notice of Motion And Motion to Intervene and Consolidate; 2020-CP-07-01850
6. Plaintiff’s Motion for Temporary Injunction And Writ of Mandamus And For Expedited Hearing; 2020-CP-07-01850
7. Defendant’s Motion to Dismiss Pursuant to SCRCP 12(B)(6); 2020-CP-07-01850
8. Answer To Plaintiff’s Complaint; 2020-CP-07-01840

9. First Amended Complaint in Mandamus; 2020-CP-07-01850
10. Amended Complaint; 2020-CP-07-01840 w/ attachments
11. Plaintiff's Supplemental And Amended Motion for Temporary Injunction And Writ of Mandamus And For Expedited Hearing w/ attachments
12. Answer to Plaintiff's Amended Complaint; 2020-CP-07-01840
13. Answer Of Defendant James Beckert To The Amended Complaint Filed By Plaintiff Beaufort County
14. Defendant's Amended Motion To Dismiss Pursuant To SCRPC Rule 12(B) And Incorporated Memorandum
15. Beaufort County's Memorandum In Support Of Supplemental And Amended Motion For Temporary Injunction And Writ of Mandamus And in Opposition To Defendant James Beckert's Motion To Dismiss As To The Rual And Critical Lands Debt Service Millage Rate w/ attachments
16. Defendant James Beckert's Memorandum In Opposition to Plaintiff Beaufort County's Amended Motion For A Temporary Injunction and Mandamus w/ attachments
17. Beaufort County's Supplemental Memorandum in Support of Supplemental And Amended Motion For Temporary Injunction and Writ Of Mandamus As To The Rual And Critical Lands Debt Service Millage Rate w/ attachments
18. Defendant Beckert's Objections To Proposed Order Granting Beaufort County's Motion For A Temporary Injunction As To Debt Service Millage Rate Calculation w/ attachment
19. Transcription of Record of November 12, 2020 Virtual Courtroom
20. Notice of Appeal
21. Proof of Service of the Notice of Appeal

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

/s/ James A. Brown, Jr.  
James A. Brown, Jr.  
Attorney for Appellant  
SC Bar Number 12213

February 19, 2021  
Beaufort, SC

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PROOF OF SERVICE  
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I, James A. Brown Jr, certify that, on February 19, 2021, I served a copy of the Initial Brief of Appellant, the Designation of Matter, and this Proof of Service upon the Intervenor/Plaintiffs, Town of Hilton Head Island, et al., and Respondent, Beaufort County, by attaching an electronic copy of these items to an email addressed to their attorneys of record, Curtis Coltrane at [curtis@coltraneandwilkins.com](mailto:curtis@coltraneandwilkins.com), M. Dawes Cooke at [mdc@barnwell-whaley.com](mailto:mdc@barnwell-whaley.com) and John W. Fletcher at [jfletcher@barnwell-whaley.com](mailto:jfletcher@barnwell-whaley.com).

Respectfully submitted by,

/s/ James A. Brown, Jr.  
James A. Brown, Jr.  
Attorney for Appellant  
SC Bar Number 12213

February 19, 2021  
Beaufort, SC

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February 19, 2021

**VIA EMAIL ONLY:**

**ctappfilings@sccourts.org**

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

Re: Beaufort County v. James Beckert  
Appellate Case No. 2020-001522

Ms. Kitchings:

Please find attached to this electronic mail correspondence one copy of the Initial Brief of Appellant, the Designation of Matter, and the Proof of Service for the same, all submitted in a pdf format, for filing in your office. Thank you for your assistance filing these items and please contact me with any questions or concerns.

Sincerely,

/s/ Jim Brown

w/ attachments as indicated

cc: M. Dawes Cooke, Jr. and John W. Fletcher, Attorneys for Beaufort County  
w/ attachments

Curtis Coltrane, Attorney for Town of Hilton Head  
w/ attachments

James Beckert,  
w/ attachments