

**RECEIVED**

APR 08 2021

SC Court of Appeals

Appellate Case Number: 2021-000053

SARAH SHARPER, ET AL..... Appellants,

v.

CITY OF NORTH CHARLESTON, COUNTY OF CHARLESTON,  
DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL, SOUTH  
CAROLINA DEPARTMENT OF TRANSPORTATION, BANKS  
CONSTRUCTION COMPANY, UNITED CONTRACTORS, INC,  
BANKS/UNITED JOINT VENTURE AND HLA, INC, COLEMAN-SNOW  
CONSULTANTS, LLC AND ICA ENGINEERING, INC. F/K/A FLORENCE &  
HUTCHESON, INC.....Respondents.

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

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

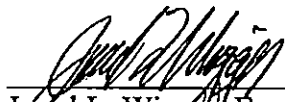
1. B & B Liquors, Inc. v. O'Neil, 361 S.C. 267, 270 S.E.2d 629, 631 (Ct.App.2004);
2. Baughman v. American Tel. and Tel., Co., 306 S.C. 101, 410 S.E.2d 537 (S.C. 1990);
3. Baugus v. Wessinger, 303 S.C. 412, 401 S.E.2d 169 (1991);
4. Cel Products LLC v. Rozelle, 357 S.C. 125, 591 S.E.2d 643 (S.C. App. 2004);
5. Doe v. Batson, 338 S.C. 291, 525 S.E.2d 909 (S.C. App. 1999);
6. Downey v. Dixon, 294 S.C. 42, 46, 362 S.E.2d 317, 319 (Ct.App. 1987);
7. Froneberger v. Kirkland Dale Smith, Janel Elizabeth Smith, Euro Mortg. Bankers, Inc.,  
406 S.C. 37, 748 S.E.2d 625 (S.C. App. 2013);
8. Hancock v. Mid-South Mgmt. Co., Inc., 381 S.C. 326, 330, 673 S.E.2d 801, 803 (2009);
9. Knox v. Greenville Hosp. Sys., 362 S.C. 566, 569-70, 608 S.E.2d 459, 461 (Ct.App.  
2005);
10. Russell v. Wachovia Bank, N.A., 353 S.C. 208, 217, 578 S.E.2d 329, 334 (2003);
11. S.C. Code §5-31-450;
12. Scott v. Greenville Hous. Auth., 353 S.C. 639, 652, 579 S.E.2d 151, 158 (Ct.App.2003);
13. Smith v. Jones (In re Estate of Smith), 419 S.C. 111, 796 D.E.2d 158 (S.C. App. 2016);
14. S.C.R.C.P. 56(c); and
15. Tupper v. Dorchester County, 326 S.E. 318, 487 S.E.2d 187 (1997).

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

**[SIGNATURE BLOCK ON FOLLOWING PAGE]**

Respectfully submitted,

**WIGGER LAW FIRM, INC.**



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April 6, 2021

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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Case No.: 2017-CP-10-4820 (Consolidated Case Number)

	2017-CP-10-4891
Other case numbers:	2017-CP-10-4892
2017-CP-10-4821	2017-CP-10-4893
2017-CP-10-4822	2017-CP-10-4894
2017-CP-10-4823	2017-CP-10-4895
2017-CP-10-4824	2017-CP-10-4896
2017-CP-10-4825	2017-CP-10-4897
2017-CP-10-4826	2017-CP-10-4898
2017-CP-10-4827	2017-CP-10-4899
2017-CP-10-4835	2017-CP-10-4900
2017-CP-10-4836	2017-CP-10-4901
2017-CP-10-4837	2017-CP-10-4903
2017-CP-10-4838	2017-CP-10-4904
2017-CP-10-4839	2017-CP-10-4905
2017-CP-10-4840	
2017-CP-10-4841	2017-CP-10-4906
2017-CP-10-4842	2017-CP-10-4907
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2017-CP-10-4847	

**Appellate Case Number: 2021-000053**

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BANKS/UNITED JOINT VENTURE AND HLA, INC, COLEMAN-SNOW  
CONSULTANTS, LLC AND ICA ENGINEERING, INC. F/K/A FLORENCE &  
HUTCHESON, INC.....Respondents.


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**PROOF OF SERVICE**

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I certify that I have served a copy of the **Initial Brief and Designation of Matter** on Defendant City of North Charleston, by depositing a copy of it in the United States Mail, postage prepaid, on April 6, 2021, addressed to their attorney of record Phillip S. Ferderigos at Barnwell Whaley Patterson & Helms, LLC at 288 Meeting Street, Suite 200 (29401) P.O. Drawer H Charleston, South Carolina 29402.

April 6, 2021

  
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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
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CONSULTANTS, LLC AND ICA ENGINEERING, INC. F/K/A FLORENCE &  
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---

**PROOF OF SERVICE**

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I certify that I have served a copy of the **Initial Brief and Designation of Matter** on Defendant County of Charleston, by depositing a copy of it in the United States Mail, postage prepaid, on April 6, 2021, addressed to their attorneys of record Amanda Maybank and Roy Maybank with Maybank Law Firm and Catherine H. Chase and Duke R. Highfield with Young Clement Rivers, LLP.

April 6, 2021



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SC Court of Appeals

April 6, 2021.

**VIA REGULAR MAIL**

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

RE: SARAH SHARPER, ET AL V. CITY OF NORTH CHARLESTON, COUNTY OF CHARLESTON, DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL, SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION, BANKS CONSTRUCTION COMPANY, UNITED CONTRACTORS, INC, BANKS/UNITED JOINT VENTURE AND HLA, INC, COLEMAN-SNOW CONSULTANTS, LLC AND ICA ENGINEERING, INC. F/K/A FLORENCE & HUTCHESON, INC  
**Consolidated Case No.: 2017-CP-10-4820**  
**Appellate Case Number: 2021-000053**

Dear South Carolina Court of Appeals:

Enclosed you will find an original and one copy of the following documents:

1. Initial Brief;
2. Designation of Matter; and
3. Proof of Services to Defendants for service of Initial Brief and Designation of Matter.

I would appreciate you filing the originals and returning the filed copy of each to me in the self-addressed stamped envelope provided.

With kindest regards, I am

Yours Very Truly,



Rebeca Powell  
Paralegal to Jarrel L. Wigger, Esq.

JLW/rbp  
Enclosures

cc:

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