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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Appellate Case No. 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.

SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION’S DESIGNATION OF
MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL

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

1. Order Granting Respondent’s Motion for Summary Judgment filed September 22, 2020;
2. Order Denying Appellants’ Motion for Reconsideration filed December 18, 2020;
3. Summons and Complaint filed September 21, 2017;
4. Amended Summons and Complaint filed October 5, 2017;
5. Second Amended Summons and Complaint filed September 28, 2018;
6. Affidavit of Arnold Blanding dated October 30, 2019;
7. Respondent’s Motion for Summary Judgment filed July 27, 2020;
8. Appellants’ Response to Respondent’s Motion for Summary Judgment filed September 21, 2020;
9. Appellants’ Motion for Reconsideration filed October 2, 2020;
10. Appellants’ Notice of Appeal dated December 18, 2020 and filed February 3, 2021;

11. Transcript of Hearing on Respondent's Motion for Summary Judgment on September 21, 2020;
12. Correspondence from Respondent's Counsel to Appellants' Counsel dated February 28, 2020;
13. Respondent's Responses to HLA, Inc.'s Interrogatories and Requests for Production served on all parties July 21, 2020.
14. Correspondence from Respondent's office to Appellants' office regarding Appellants' discovery requests to Respondent on September 11, 2020.

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

Respectfully submitted,

W. Coleman Lawrimore

J.J. Anderson, Esq.

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Anderson Reynolds & Stephens, LLC

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ATTORNEYS FOR RESPONDENT SOUTH

CAROLINA DEPARTMENT OF

TRANSPORTATION

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RESPONDENT SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION’S PROOF
OF SERVICE OF INITIAL REPLY BRIEF

I hereby certify that on June 7, 2021, I served a copy of Respondent South Carolina Department of Transportation’s Initial Brief and Designation of Matter on the following:

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

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June 7, 2021

VIA U.S. MAIL

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

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

- 1) Respondent South Carolina Department of Transportation's Initial Reply Brief;
- 2) Respondent South Carolina Department of Transportation's Designation of Matter; and
- 3) Proof of Service of Respondent's Initial Reply Brief and Designation of Matter.

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

Sincerely yours,

W. Coleman Lawrimore

W. Coleman Lawrimore

WCL/fjm
Enclosures