

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUN 07 2021

APPEAL FROM Horry COUNTY
Court of Common Pleas

SC Court of Appeals

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2015-CP-26-8179
Appellate Case No. 2021-000136

Robert DeCiero, a resident of Long Bay Estates Subdivision,
Myrtle Beach, South Carolina,.....Appellant,

v.

Horry County, State of South Carolina,.....Respondent.

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

Respondent proposes the following to be included in the Record on Appeal, in addition to the matters proposed by Appellant in his Designation of Matter to Be Included in the Record on Appeal dated April 21, 2021:

1. "Legal Notice" sent by Plaintiff to fellow property owners July 18, 2002 (Respondent's Trial Exhibit 1)
2. Minutes, Horry County Council subcommittee, May 6, 2004 (Respondent's Trial Exhibit 10)
3. Letter sent by Appellant's counsel to Property owners, June 26, 2017 (Respondent's Trial Exhibit 7)
4. Letter sent to Weaver, July 25, 2005 (Respondent's Trial Exhibit 17)

5. Zoning district maps (Respondent's Trial Exhibit 8)
6. § 1306 Art. XIII, Horry County Zoning Ordinance (Respondent's Trial Exhibit 21)

I certify this Designation contains no matter which is irrelevant to this Appeal.

CROSBY LAW FIRM, LLC



Elise F. Crosby SC Bar No. 7077
405 Dozier Street
Georgetown, South Carolina 29440
(843) 546-3103
Attorney for Respondent

Georgetown, S.C.
June 3, 2021

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUN 07 2021

APPEAL FROM HORRY COUNTY
Court of Common Pleas

SC Court of Appeals

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2015-CP-26-8179
Appellate Case No. 2021-000136

Roberts DeCiero, a resident of Long Bay Estates Subdivision,
Myrtle Beach, South Carolina,.....Appellant,

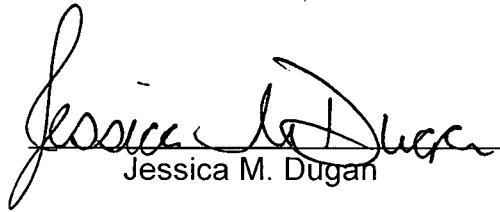
v.

Horry County, State of South Carolina,.....Respondent.

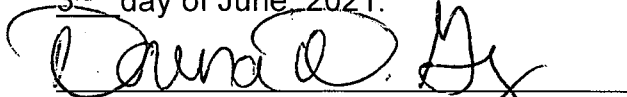
PROOF OF SERVICE

I, Jessica M. Dugan do hereby certify that I am an employee of THE CROSBY LAW FIRM, LLC, attorney for the Respondent in the above-referenced action, do hereby certify that I did this 3rd day of June, 2021, by first class mail, postage prepaid, serve a copy of **Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal** to the following Attorney, addressed as follows:

Thomas C. Brittain, Esquire
The Brittain Law Firm, P.A.
4614 Oleander Drive
Myrtle Beach, SC 29577


Jessica M. Dugan

Sworn to before me this
3rd day of June 2021.



Notary Public for South Carolina

My Commission Expires: 1/23/22



JOE M. CROSBY
jcroby@crosbyfirm.com

CROSBY LAW FIRM, LLC
405 DOZIER STREET
GEORGETOWN, S. C. 29440
TEL: (843) 546-3103 FAX: (843) 546-0747
www.crosbyfirm.com

ELISE F. CROSBY*
ecrosby@crosbyfirm.com
*Certified Family Court Mediator

June 3, 2021

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

JUN 07 2021

SC Court of Appeals

RE: *Robert DeCiero vs. Horry County, State of South Carolina*
Appellate Case No.: 2021-000136

Dear Ms. Kitchings:

Enclosed please find for filing in regards to the above-referenced case the Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal, along with the Proof of Service.

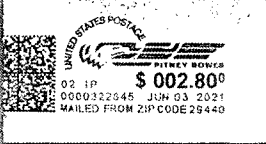
With kindest regards,

Respectfully yours,


Elise F. Crosby

EFC/jmd
Enc

cc: Thomas C. Brittain, Esq. ✓



Crosby Law Firm, LLC
405 Dozier Street
Georgetown, SC 29440

RECEIVED
JUN 07 2021
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211