

RECEIVED

Jul 29 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

Civil Action No. 2016-CP-14-198
Appellate Case No. 2019-001970

Rebecca J. Robbins and Marie Babayan, individually
and on behalf of all those similarly situated, Appellants,

v.

Town of Turbeville and the Town of Turbeville Police Department, Respondents,

v.

The State of South Carolina, Third Party Defendants.

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

Rebecca J. Robbins and Marie Babayan, individually and on behalf of all those similarly
situated (collectively, “Appellants”), by and through undersigned counsel, propose the following
be included in the Record on Appeal:

ORDERS

1. Order Denying Plaintiffs’ Motion for Summary Judgment, Granting Defendant’s
Motion for Summary Judgment, and Denying Plaintiffs’ Motion for Class Certification, filed
October 30, 2019;

PLEADINGS

2. Plaintiffs Rebecca J. Robbins and Marie Babayan, individually and on behalf of all those similarly situated, Complaint with Exhibits A-K, Filed May 9, 2016;

3. Plaintiffs Rebecca J. Robbins and Marie Babayan, individually and on behalf of all those similarly situated, Amended Complaint with Exhibits A-K, Filed July 27, 2017;

4. Defendants Town of Turbeville and the Turbeville Police Department's Answer and Third-Party Claim of Defendants, Filed December 8, 2016;

5. Defendants Town of Turbeville and the Turbeville Police Department's Answer to Amended Complaint and First Amended Third-Party Claim of Defendants, Filed August 11, 2017;

MOTIONS AND MEMORANDA

6. Plaintiffs' Motion for Class Certification, for Partial Summary Judgment, and to Defer Class Notice with Exhibits A-C, filed November 1, 2017;

7. Town of Turbeville's Opposition to Plaintiffs' Motion for Class Certification, filed June 20, 2019;

8. Defendants/Third Party Plaintiffs' Motion for Partial Summary Judgment on Plaintiffs' Claims for Injunctive and Declaratory Relief with Exhibits A-B, filed February 14, 2018;

9. Plaintiffs' Response to Turbeville's Motion for Partial Summary Judgment, filed June 27, 2019; and

The undersigned hereby certifies, pursuant to Rule 209(c), SCACR, that Appellants' Designation of Matter to be included in the Record on Appeal contains no matter which is irrelevant to the appeal.

s/ John S. Simmons
John S. Simmons (SC Bar No. 10260)
Simmons Law Firm, LLC
1711 Pickens Street
Columbia, SC 29201
jsimmons@simmonsfirm.com
(803) 779-4600

*Counsel for Appellants Rebecca J. Robbins and
Marie Babayan, individually and on behalf of all
those similarly situated*

July 29, 2021
Columbia, South Carolina