

**RECEIVED**  
**Sep 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. .... Third Party Defendants.

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

Respondents the Town of Turbeville and the Town of Turbeville Police Department  
propose the following to be included in the Record on Appeal:

1. Respondents' Memorandum in Opposition to the State of South Carolina's Motion to Dismiss dated March 17, 2017;
2. State of South Carolina's Motion to Dismiss dated February 17, 2017 ;
3. Deposition of Charlotte Daniels, 8:6-9;
4. Deposition of David Gravely, 6:24-7:25, 8:6-10;
5. Deposition of Wayman Goudy, 6:3-6, 7:6;
6. Deposition of Ursula Hertz, 7:14-15;

7. Deposition of William Kellett, 6:2-4;
8. Deposition of Delores Lancaster, 9:23-25;
9. Deposition of Garry Ludwick, 5:25-6:17;
10. Deposition of Britney Lynn, 8:9-10;
11. Deposition of Jose Padilla, 7:1-3;
12. Deposition of Mary Pittman, 8:1; 12, 23-13:1; and
13. Deposition of David Wells, 5:23-7:13.

Counsel for Respondents certifies that this Designation contains no matter that is irrelevant to this appeal.

September 29, 2021

By: s/ Richard S. Dukes, Jr.

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