

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Oct 22 2021

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Erin D. Dean, Special Referee

Case No.: 2019-CP-07-00818
Appellate Case No. 2021-00321

Mare Baracco..... Appellant-Respondent,

v.

Beaufort County..... Respondent-Appellant.

**DESIGNATION OF CONTENTS OF RECORD ON APPEAL
BY RESPONDENT-APPELLANT BEAUFORT COUNTY**

The Respondent-Appellant proposes that the following be included in the Record on Appeal:

1. Amended Complaint with Exhibits dated June 27, 2019.
2. Answer to Amended Complaint filed on August 14, 2019.
3. Plaintiff's Memorandum of Law filed February 11, 2020.
4. Order Assigning Case to Judge Buckner filed on May 28, 2020.
5. Defendant's Memorandum of Law filed June 1, 2020.
6. Reply to County's Memorandum of Law filed June 2, 2020.
7. Order of Judge Buckner dated June 2, 2020, and filed June 3, 2020.
8. Email of Plaintiff to Defendant and Special Referee dated June 19, 2020.

9. Email of Defendant to Plaintiff and Special Referee dated June 29, 2020.
10. Exemption Log and Cover Letter from Defendant dated July 6, 2020.
11. Exemption Log and Cover Letter from Defendant dated July 7, 2020.
12. Letter from Plaintiff to Special Referee dated July 13, 2020.
13. Email from Special Referee to Parties Requesting Clarification dated July 28, 2020.
14. Letter from Plaintiff to Special Referee dated July 28, 2020.
15. Letter from Special Referee to Plaintiff dated July 29, 2020.
16. Letter from Defendant to Special Referee dated August 12, 2020.
17. Exemption Log and Cover Letter from Defendant dated September 3, 2020.
18. Exemption Log and Cover Letter from Defendant dated September 3, 2020.
19. Pre-Trial Brief of Plaintiff filed September 20, 2020.
20. Pre-Trial Brief of Defendant filed September 22, 2020.
21. Final Order filed November 13, 2020.
22. Plaintiff's Motion for Reconsideration filed November 19, 2020.
23. Defendant's Motion for Reconsideration filed November 23, 2020.
24. Plaintiff's Memorandum of Law in Opposition to Motion for Reconsideration filed on December 17, 2020.
25. Defendant's Memorandum of Law in Opposition to Motion for Reconsideration filed on January 8, 2021.
26. Defendant's Reply to Memorandum in Opposition filed on January 15, 2021.
27. Plaintiff's Reply to Memorandum in Opposition filed on January 18, 2021.
28. Plaintiff's Reply to Defendant's Reply filed on January 19, 2021.
29. Order Denying Reconsideration.

30. Transcript of Hearing Judge Buckner.
31. Transcript of Proceedings Erin Dean.
32. Court's Exhibits 1-4. Un-redacted emails to be provided separately for *in camera* inspection.
33. Trial Exhibits 1-8, 22.

I certify that this designation contains no matter which is irrelevant to this appeal. **There is no change from the designation filed on October 15, 2021.**

October 22, 2021

s/ E. Richardson LaBruce
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v.

Beaufort County,

Respondent-Appellant.

PROOF OF SERVICE

I certify that I have served the Initial Brief of Respondent-Appellant and Designation of Contents of Record on Appeal, by emailing a copy of it to Thomas R. Goldstein, Attorney for Appellant, at email tgoldstein@cobblaw.net on October 22, 2021.

October 22, 2021

s/ E. Richardson LaBruce
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Also admitted in:
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† New York

□ Court Certified Mediator
▪ Court Certified Arbitrator / Mediator

October 22, 2021

Hon. Jenny A. Kitchings,
Clerk of Court
S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Mare Baracco v. Beaufort County; 2019-CP-07-00818
Appellate Tracking No.: 2021-00321
Our File No. 6868.002 – Beaufort County

Dear Ms. Kitchings,

I am filing an electronic version of the Initial Brief of Respondent – Appellant and Designation of Contents of Record on Appeal along with a Proof of Service. I understand that I am not required to file a paper copy of the Initial Brief. I am, however, sending a paper copy to opposing counsel (unless he tells me he does not want me to do that). Please let me know if I need to do anything other than electronic filing on the Initial Brief. I thank you in advance for your attention.

With best regards, I am

Sincerely yours,

/s/ E. Richardson LaBruce
E. Richardson LaBruce
FINGER, MELNICK & BROOKS, P.A.

ERL/
Enclosure: Respondent's Initial Brief (digital copy)

cc: T. Goldstein

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