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Jan 04 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM BERKELEY COUNTY
COURT OF COMMON PLEAS
THE HONORABLE EDGAR W. DICKSON
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2021-001173
CIVIL ACTION NO. 2020-CP-08-00773

Stephanie Michelle Gardner,

APPELLANT,

versus

Berkeley County Sheriff's Office and
Town of Moncks Corner,

RESPONDENTS.

**DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL ON BEHALF OF RESPONDENT TOWN OF MONCK'S CORNER**

The Town of Moncks Corner, Respondent in the above-referenced appeal,
proposes the following to be included in the Record on Appeal:

1. Complaint, filed March 20, 2020;
2. Answer of Town of Moncks Corner, filed March 24, 2020;
3. Answer of Berkeley County Sheriff's Office, filed March 25, 2020;
4. Amended Answer of Berkeley County Sheriff's Office, filed November 19, 2020;
5. Berkeley County Sheriff's Office Motion for Summary Judgment, filed February 19, 2021;

6. Town of Moncks Corner Motion for Summary Judgment, filed March 1, 2021;
7. Berkeley County Sheriff's Office Memorandum of Law in Support of Motion for Summary Judgment, filed March 29, 2021 with all exhibits;
 - A. Deposition of Stephanie Michelle Gardner;
 - B. Agreement between Sheriff's Office and Moncks Corner Police Department;
 - C. Arrest Warrants;
 - D. Facebook Posting;
 - E. Deposition of Chief Jeremey Baker; and
 - F. Photographs;
8. Town of Moncks Corner Memorandum in Support of Summary Judgment, filed March 29, 2021 with all exhibits:
 1. 4 Arrest Warrants; and
 2. Dismissals;
9. Plaintiff's Memorandum in Opposition to Defendants' Motions for Summary Judgment, filed April 1, 2021;
10. Incident Report;
11. Deposition of Brooks Matthew Barlow;
12. April 5, 2021 Hearing Transcript on Motions for Summary Judgment;
13. Order Granting Berkeley County Sheriff's Office's Motion for Summary Judgment, filed April 27, 2021;
14. Order Granting Town of Moncks Corner Motion for Summary Judgment, filed April 27, 2021;
15. Plaintiff's Motion to Reconsider and Memorandum in Support, filed May 6, 2021;
16. Town of Moncks Corner Opposition to Motion to Reconsider, filed May 12, 2021;

17. Berkeley County Sheriff's Office Opposition to Motion to Reconsider, filed May 12, 2021;
18. Order Denying Motion to Reconsider, filed September 13, 2021.

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

Respectfully submitted,

/s/ Carmen V. Ganjehsani
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**ATTORNEYS FOR RESPONDENT
TOWN OF MONCK'S CORNER**

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CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Respondent, Town of Moncks Corner, do hereby certify that I have this date served the foregoing Designation of Matter to be Included in the Record on Appeal, dated January 4, 2022, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Order dated August 25, 2021, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Louis D. Nettles
NETTLES LAW FIRM
Post Office Box 5533
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Attorney for Appellant Stephanie Michelle Gardner

Robin Lilley Jackson
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Charleston, South Carolina 29422
robin@sennlegal.com
Attorney for Respondent Berkeley County Sheriff's Office

A copy of the sent email is enclosed with this Certificate of Service.

/s Carmen V. Ganjehsani
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**ATTORNEYS FOR RESPONDENT
TOWN OF MONCK'S CORNER**


Dated: January 4, 2022.

Carmen Ganjehsani

From: Carmen Ganjehsani
Sent: Tuesday, January 04, 2022 4:17 PM
To: louis@nettlefirm.com; robin@sennlegal.com
Cc: Drew Butler; James Haarsgaard; Beth Tobul (BTobul@RichardsonPlowden.com); Hope Grate
Subject: 2021-001173 Gardner v. Town of Moncks Corner et al
Attachments: 2021-001173 Gardner v. Town of Moncks Corner et al, Designations.pdf; 2021-001173 Gardner v. Town of Moncks Corner et al, Initial Respondent's Brief.pdf

Pursuant to the Supreme Court's Order dated August 25, 2021, please find served upon you the Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal on behalf of Respondent Town of Moncks Corner.

Thank you,
Carmen Ganjehsani

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