

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE RICHLAND COUNTY  
COURT OF COMMON PLEAS

The Honorable Jocelyn Newman  
Circuit Court Judge

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Civil Action No.: 2020-CP-40-01996  
Appellate Case No.: 2021-001012

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State of South Carolina, ex rel Alan Wilson, Attorney General.....Respondent

v.

City of Columbia..... Appellant

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

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In addition to items previously designated, Appellant proposes the following be included in the Record on Appeal:

1. Respondent’s Complaint, filed April 16, 2020.
2. Attachments to Respondent’s Complaint, (Parts 1 and 2) filed April 16, 2020.
3. Appellant’s Answer to Complaint, filed May 18, 2020.
4. Respondent’s Motion for Judgment on the Pleadings, dated August 11, 2020.
5. Appellant’s Response to State’s Judgement on the Pleadings, dated August 20, 2020.
6. Respondent’s Memorandum in Support of Judgment on the Pleadings, filed December 2, 2020.
7. Appellant’s Notice of Motion and Motion Pursuant to Rule 59(e), dated May 11, 2021.
8. Respondent’s Memorandum in Opposition of Appellant’s Rule 59 (e) Motion dated June 25, 2021.
9. Form 4 Order Denying Appellant’s Rule 59 (e) Motion August 18, 2021.
10. Notice of Appeal filed September 16, 2021;
11. Proof of Service of Appellant’s Notice of Appeal filed September 27, 2021.

12. Appellant's Notice of Motion and Motion Pursuant to Rule 59(e), dated September 16, 2021.

CERTIFICATE OF COMPLIANCE WITH RULE 209(c), SCACR

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

s/R. Allyce Bailey

R. Allyce Bailey, S.C. Bar No. 10196

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January 24, 2022

*Attorney for Appellant City of Columbia*

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SC Court of Appeals

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v.

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**PROOF OF SERVICE**

The undersigned hereby certifies that she served a copy of the *Initial Reply Brief of Appellant and Designation of Matter* upon counsel for Respondent via email indicated below on this 24<sup>th</sup> day of January, 2022:

Alan Wilson, Attorney General – [agwilson@scag.gov](mailto:agwilson@scag.gov)  
David S. Jones, Assistant Attorney General – [djones@scag.gov](mailto:djones@scag.gov)  
Robert D. Cook, Solicitor General [rcook@scag.gov](mailto:rcook@scag.gov)  
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Office of the Attorney General  
Post Office Box 11549, Columbia, South Carolina 29211

Geraldine S. Pleasant  
Lead Paralegal for the City of Columbia

January 24, 2022  
Columbia, South Carolina



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January 24, 2022

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**Jan 24 2022**

**SC Court of Appeals**

Via Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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

RE: State of South Carolina Ex Rel Alan Wilson Attorney General v.  
City of Columbia  
Circuit Court File No.: 2020-CP-40-01996  
Appellate Case No.: 2021-001012

Dear Ms. Kitchings:

Enclosed for filing, please find *Appellant's Initial Reply Brief and Designation of Matter*, as well as, the *Proof of Service* in the above referenced case.

By copy of this letter, I am serving same on counsel for the parties.

Sincerely,

R. Allyce Bailey  
Assistant City Attorney

RAB/gsp  
Enclosure(s) as Stated

cc: Alan Wilson, Attorney General – [agwilson@scag.gov](mailto:agwilson@scag.gov)  
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