

**RECEIVED**

**Jan 20 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
DeAndrea Gist Benjamin, Circuit Court Judge

---

Appellate Case No. 2020-001135  
Case No. 2015-CP-40-1805

---

Wendy Brawley,..... Respondent-Appellant,

v.

Richland County, South Carolina ..... Appellant-Respondent.

---

**APPELLANT-RESPONDENT RICHLAND COUNTY'S  
DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

---

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

1. Form Order filed August 4, 2015
2. Order filed October 24, 2016
3. Final Order on the Merits filed February 13, 2020

4. Order on Defendant's Motion to Alter or Amend Order, filed July 16, 2020
5. Form Order filed July 16, 2020
6. Order Awarding Plaintiff Attorney's Fees and Costs, filed November 30, 2020
7. Amended Order Awarding Plaintiff Attorney's Fees and Costs, filed January 19, 2021
8. Complaint, with attached exhibits, filed March 27, 2015
9. Answer, filed April 30, 2015
10. Motion to Dismiss filed April 30, 2015
11. Motion for Summary Judgment, filed June 15, 2016
12. Memorandum in Support of Motion for Summary Judgment, filed August 23, 2016
13. Motion to Alter or Amend Order, filed February 24, 2020 (with exhibit)
14. Affidavit as to Attorney's Fees and Costs, filed July 27, 2020
15. Motion to Alter of Amend Order, filed December 10, 2020
16. Memorandum Opposing Award of Attorney's Fees, filed August 11, 2020
17. Defendant's Objections to Plaintiff's Billing Records, filed November 23, 2020
18. Non-Jury Trial Transcript, September 5, 2019  
pp. 1-305
19. Plaintiff's Trial Exhibits 1-23

20. Defendant's Trial Exhibits 1-2
21. Transcript of Motion Hearing, November 9, 2020, pp. 1-42
22. Transcript of Motion Hearing, January 8, 2021, pp. 1-43

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

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann  
ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
(803) 881-8920

*Counsel for Appellant-Respondent  
Richland County*

January 20, 2022

**RECEIVED**

**Jan 20 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
DeAndrea Gist Benjamin, Circuit Court Judge

---

Appellate Case No. 2020-001135  
Case No. 2015-CP-40-1805

---

Wendy Brawley,..... Respondent-Appellant,

v.

Richland County, South Carolina ..... Appellant-Respondent.

---

**CERTIFICATE OF SERVICE**

---

Pursuant to Section (d)(1) of the Supreme Court’s Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, the undersigned employee of Lindemann & Davis, P.A., counsel for the Appellant-Respondent Richland County, does hereby certify that service of the **Initial Appellant’s Brief of Appellant-Respondent Richland County** and **Appellant-Respondent Richland County’s Designation of Matter to be Included in the Record on Appeal** was made upon all counsel of record by email only this the 20th day of January 2022:

Jenkins M. Mann, Esquire  
Shaun C. Blake, Esquire  
Rogers, Lewis, Jackson, Mann & Quinn, LLC  
Email: [jmann@rogerslewis.com](mailto:jmann@rogerslewis.com)  
Email: [sblake@rogerslewis.com](mailto:sblake@rogerslewis.com)

*s/ Andrew F. Lindemann*



Telephone (803) 881-8920  
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
Columbia, South Carolina 29260

January 20, 2022

**ANDREW F. LINDEMANN\***  
Direct Dial: (803) 881-8921  
Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

**JAMES M. DAVIS, JR.†**  
Direct Dial: (803) 881-8922  
Email: [jim@ldlawsc.com](mailto:jim@ldlawsc.com)

\*Also Admitted in North Carolina  
†Certified Mediator

**RECEIVED**  
**Jan 20 2022**  
**SC Court of Appeals**

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Wendy Brawley v. Richland County, South Carolina  
Appellate Case Number: 2020-001135  
Civil Action Number: 2015-CP-40-1805  
Our File Number: 314.9670

Dear Ms. Kitchings:

In accordance with Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing the **Initial Appellant's Brief of Appellant-Respondent Richland County and Appellant-Respondent Richland County's Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. In accordance with Section (d)(1) of this same order, I am hereby serving copies on all counsel of record by email only.

If you have any questions, please advise. Thank you for your consideration of this request.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosures

cc: Jenkins M. Mann, Esquires (*Via Email Only*)  
Shaun C. Blake, Esquires (*Via Email Only*)