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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The 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.

**JOINT 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 22, 2021.**

January 26, 2022.

s/ E. Richardson LaBruce
E. Richardson LaBruce, S.C. Bar No. 80106
FINGER, MELNICK, BROOKS & LABRUCE, P.A.
Post Office Box 24005
Hilton Head Island, SC 29925-4005
Telephone: (843) 681-7000
Email: erlabruce@fingerlaw.com

*Attorney(s) for Respondent-Appellant Beaufort
County*