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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ANDERSON COUNTY  
CIRCUIT COURT

R. SCOTT SPROUSE, CIRCUIT COURT JUDGE

Appellate Case No.: 2021-000285

**MOATS CONSTRUCTION, INC.** ..... Appellant,

v.

**CITY COUNCIL OF THE CITY OF ANDERSON** ..... Respondent.

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

Respondent City of Anderson proposes the following be included in the Record on Appeal:

1. Determination of City Council dated March 17, 2020;
2. Form 4 Order filed February 10, 2021;
3. Order of the Honorable Scott Sprouse filed February 12, 2021;
4. Appellant's Notice of Appeal to the Circuit Court filed September 29, 2020;
5. Respondent's Notice of Motion and Motion to Dismiss dated January 21, 2021;
6. Appellant's Notice of Appeal to the Court of Appeals filed March 16, 2021;

7. Transcript of February 8, 2021 Motion to Dismiss hearing before the Honorable Scott Sprouse.

By: s/Stacey Todd Coffee  
Stacey Todd Coffee (SC Bar No. 6525)  
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401 South Main Street  
Anderson, SC 29624

Attorneys for Respondent City of Anderson

Date: February 2, 2022

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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that a copy of the Initial Brief of Respondent and Designation of Matter was served via electronic mail and by first class mail, postage prepaid this 2<sup>nd</sup> day of February, 2022, upon the following:

C. David Beale, Jr.  
T. Jeff Goodwyn, Jr.  
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February 2, 2022

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*(Via Electronic Mail and U.S. Mail)*

February 2, 2022

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**SC Court of Appeals**

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: Moats Construction, Inc. v. City Council of the City of Anderson  
Case No.:2021-000285

Dear Ms. Kitchings:

Please find enclosed for filing the Initial Brief of Respondent, Designation of Matter and Certificate of Service. A copy of the same was served on all counsel of record via electronic mail and U.S. Mail.

If you have any questions, please do not hesitate to contact me.

With kind regards, I remain,

Yours very truly,

Logan & Jolly, LLP

Stacey Todd Coffee

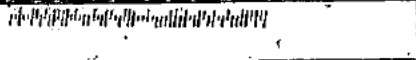
STC:krm

cc: T. Jeff Goodwyn, Esquire  
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