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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2022-000017
Civil Action No. 2021-CP-22-00605

Joseph N. Grate,..... Appellant,

v.

Christopher Douglas Brown, Respondents.

**RESPONDENT’S REPLY TO APPELLANT’S
OBJECTION TO MOTION TO STRIKE**

The Appellant’s Objection to Motion to Strike consists of a single sentence that states: “Appellant herein, Object [sic] to the Respondent’s Motion to Strike, on the grounds that the Designation of Matters, is in compliance with: RULE 209 (b) and RULE 201 (c).” Appellant provides no support for this assertion, which is plainly inaccurate because, as set forth in the Respondent’s Motion to Strike, the Appellant’s Designation of Matters to Be Included in the Record on Appeal (the “Appellant’s DOM”) proposes for inclusion in the Record on Appeal materials which were not presented to the Circuit Court and, therefore, may not properly be included in the Record on Appeal.¹ Accordingly, Respondent reiterates his request that those materials be stricken from the Appellant’s DOM.

¹ The specific materials were identified in a bulleted list in the Motion to Strike.

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