

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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MAY 21 2013

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Benjamin H. Culbertson, Circuit Court Judge

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C.A. No.: 2012-213509

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JACQUELINE SMITH.....Appellant(s)

v.

HORRY COUNTY SCHOOLS..... Respondent(s).

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

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CHILDS & HALLIGAN, P.A.

Kathryn Long Mahoney, S.C. Bar No. 65332  
John M. Reagle, S.C. Bar No. 14185  
Vernie L. Williams, S.C. Bar No. 9511

[kmahoney@childs-halligan.net](mailto:kmahoney@childs-halligan.net)  
[jreagle@childs-halligan.net](mailto:jreagle@childs-halligan.net)  
[vwilliams@childs-halligan.net](mailto:vwilliams@childs-halligan.net)

1301 Gervais Street, Suite 900  
P.O. Box 11367  
Columbia, SC 29211  
(803) 254-4035  
Attorneys for Respondent Horry County School  
District

Respondent proposes the following be included in the Record on Appeal:

- (1) Letter from Will Garland to Jacqueline Smith dated March 29, 2011
- (2) Hearing transcript from Board hearing which took place on March 24, 2011 (pp. 70-80; p. 83; pp. 85-90; pp. 93-95; pp. 150-157; pp. 159-160; pp. 163-165; pp. 175-182; pp. 194-199; p. 201; p. 216; pp. 218-223; p. 226; pp. 228-234; pp. 411-413; pp. 416-417; and pp. 539-541)
- (3) Deposition of Connie Huddle taken on March 22, 2011 (pp. 6-11)

**EXHIBITS TO HEARING ON MARCH 24, 2011**

- (4) Compl. Exh. 1 – Letter from Dr. Cindy Elsberry to Smith dated January 5, 2011
- (5) Compl. Exh. 4 – Letter from Curlee to Smith dated October 26, 2010
- (6) Compl. Exh. 5 – Letter from Margaret Sordian to Smith dated October 25, 2010
- (7) Compl. Exh. 6 – Letter from Sordian to Smith dated October 21, 2010
- (8) Compl. Exh. 7 -- Letter from Sordian to Smith dated October 19, 2010
- (9) Compl. Exh. 8 – Letter from Sordian to Smith dated October 11, 2010
- (10) Compl. Exh. 10 – Letter from Curlee to Smith dated February 26, 2008
- (11) Compl. Exh. 11 – Letter from Jeffrey Riddle to Smith dated February 22, 2008
- (12) Compl. Exh. 12 – Letter from Michelle Greene-Graham to Smith dated November 20, 2006
- (13) Compl. Exh. 14 – Summary notes from conferences with parents at Conway Middle School (16 pages)
- (14) Compl. Exh. 17 – Statement of Sordian dated November 2, 2010
- (15) Compl. Exh. 18 – Statements of Yvonne Williams dated November 1 and 2, 2010
- (16) Compl. Exh. 19 – Summary of concerns from Sordian dated September 23, 2010
- (17) Compl. Exh. 20 – Documents regarding CA parent
- (18) Compl. Exh. 21 – Documents regarding BT parent
- (19) Compl. Exh. 22 – E-mails and notes regarding Ocean Bay Middle School

- (20) Compl. Exh. 24 – Smith's teacher assistance plan for the 2006-07 school year
- (21) Compl. Exh. 25 – E-mails and notes regarding North Myrtle Beach Intermediate School (11 pages)
- (22) Compl. Exh. 26 – Summary of concerns from Green-Graham dated February 15, 2008
- (23) Portion of Respondent's ("Smith") Exhibit 1 – District policy on Discipline, Suspension, and Dismissal of Professional Staff (pp. 177-178)

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



Kathryn Long Mahoney, Esq.  
~~John M. Reagle, Esq.~~  
Vernie L. Williams, Esq.

CHILDS & HALLIGAN, P.A.  
The Tower at Gervais Street  
1301 Gervais Street, Suite 900  
P.O. Box 11367  
Columbia, SC 29211  
(803) 254-4035  
Attorneys for Respondent

May 20, 2013

Columbia, South Carolina

Other Counsel of Record:

W. Allen Nickles, III, Esq.  
Nickles Law Firm, LLC  
P.O. Box 1866  
Columbia, SC 29202-1866  
(803) 779-8080

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that he has served Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal by depositing a copy of the same in the U.S. Mail service, postage prepaid and addressed as follows:

W. Allen Nickles, III, Esq.  
Susan M. Fittipaldi, Esq.  
Nickles Law Firm, LLC  
P. O. Box 1866  
Columbia, SC 29202-1866

This 20th day of May, 2013.

CHILDS & HALLIGAN, P.A.



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John M. Reagle, S.C. Bar No. 14185  
jreagle@childs-halligan.net

1301 Gervais Street, Suite 900

P.O. Box 11367

Columbia, SC 29211

(803) 254-4035

Attorneys for Respondent Horry County School  
District