

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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SC Court of Appeals

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APPEAL FROM THE CHARLESTON COUNTY COURT OF COMMON PLEAS

THE HONORABLE ROGER M. YOUNG, CIRCUIT COURT JUDGE

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Appellate Case No. 2021-001414

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Charleston Advancement Academy High School.....Appellant,

V.

South Carolina Public Charter School District..... Respondent.

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

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**PRITCHARD LAW GROUP, LLC**

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- AND -

**TURNER & CAUDELL ATTORNEYS AT LAW**

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(803) 828-9708

***ATTORNEYS FOR APPELLANT,  
CHARLESTON ADVANCEMENT  
ACADEMY HIGH SCHOOL***

December 2, 2022  
Charleston, South Carolina


**PLEASE TAKE NOTICE THAT** pursuant to Rule 209, SCACR, **APPELLANT**, Charleston Advancement Academy, hereby proposes to include the following parts of the transcript, pleadings, orders, exhibits, or other materials in the record on appeal:

1. *[Proposed] Order Denying Plaintiff's Motion for TRO and Preliminary Injunction* filed February 26, 2020.
2. *Order Denying Motion to Reconsider* dated October 24, 2020, and filed October 25, 2021.
3. *Order* dated and signed November 3, 2021.
4. *Order* of the United States District Court for the Western District of North Carolina, Case No. 3:20-cv-00062-MOC-DSC dated April 23, 2020, and filed April 24, 2020.
5. *Summons & Complaint* dated and filed December 20, 2019.
6. *Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction* dated and filed December 20, 2019, together with exhibit thereto.
7. *Amended Summons & Amended Complaint* dated and filed January 23, 2020, together with exhibits thereto.
8. *Plaintiff's Amended Motion for Temporary Restraining Order and Preliminary Injunction* dated and filed January 23, 2020, together with exhibit thereto.
9. *Plaintiffs Memorandum in Support of its Amended Motion for Temporary Restraining Order and Preliminary Injunction* dated and filed February 7, 2020, together with exhibit thereto.
10. *Defendants Motion to Dismiss Pursuant to S.C.R.Civ.P. 12(b)(1), 12(b)(2) and 12(b)(6)* dated and filed February 13, 2020.
11. *Defendants Memorandum in Opposition to Motion for Temporary Restraining Order*, dated February 13, 2020.
12. *Plaintiff's Motion to Alter or Amend the Order Denying Plaintiff's Motion for a TRO and Preliminary Injunction* dated and filed March 5, 2022.
13. *Plaintiffs Memorandum of Law In Opposition to Defendant's Motion to Dismiss* dated and filed June 12, 2020, together with exhibits.
14. *Defendant's Memorandum In Support of Motion to Dismiss* dated June 12, 2020, and filed June 15, 2020, together with exhibits.
15. *Supplemental Memorandum In Support of Motion to Dismiss* dated and filed October 15, 2021, together with exhibit.

- 16. *Affidavit of Nadine Deif* dated and filed February 7, 2020.
- 17. *Affidavit of Dr. Robert E. Bohnstengel* dated and filed February 7, 2020.
- 18. *Award of Arbitrator* in Matter 01-16-0003-5142 dated March 16, 2020.
- 19. *Award of Arbitrator* in Matter 01-20-0010-1030 dated June 13, 2022.
- 19. *Notice of Appeal* dated and filed December 3, 2021.
- 20. *Transcript of Hearing on October 26, 2021* dated March 10, 2022.

Respectfully Submitted,

**PRITCHARD LAW GROUP, LLC**

  
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Charleston, South Carolina

- AND -

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Appellate Case No. 2021-001414

Charleston Advancement Academy High School: .....Appellant,

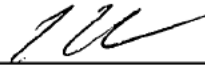
V.

South Carolina Public Charter School District..... Respondent.

**PROOF OF SERVICE**

I certify that I have served the foregoing *Designation of Matter to be Included in the Record on Appeal* on Respondent, South Carolina Public Charter School District, by e-mailing the same to its attorney of record, Erik T. Norton, Esq., addressed to Harrell, Martin & Peace, P.A., Post Office Box 1000, Chapin, South Carolina 29036, e-mail address [Erik@hmp-law.com](mailto:Erik@hmp-law.com) on December 2, 2022.

**PRITCHARD LAW GROUP, LLC**

  
\_\_\_\_\_  
Edward K. Pritchard, III, Esq.

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# pritchard

LAW GROUP

Edward K. Pritchard, III, Esq.  
e-mail: [epritchard@pritchardlawgroup.com](mailto:epritchard@pritchardlawgroup.com)  
Certified Mediator

December 2, 2022

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The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**Re: Charleston Advancement Academy High School, Appellant, v. South Carolina  
Public Charter School District, Respondent  
Appellate Case No. 2021-001414**

Dear Ms. Kitchings:

Enclosed herewith for filing please see an original and one copies of the *Initial Brief* of Appellant, Charleston Advancement Academy High School, *Designation of Matter to be Included in the Record on Appeal* of Appellant, Charleston Advancement Academy High School and a self-addressed return envelope. Please file the Brief and Designation and return a filed stamped copy of each in the enclose envelope. By copy of this letter I am serving counsel for Respondent with a copy of the motion.

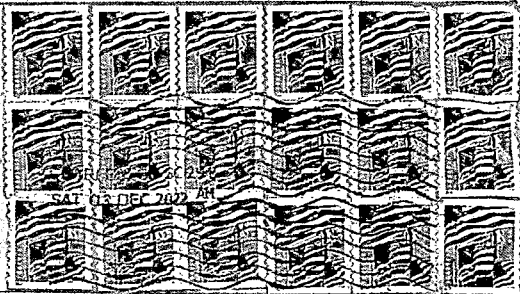
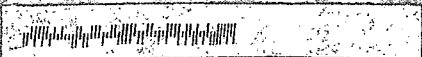
With warmest personal regards, I am

Yours very truly,



Edward K. Pritchard, III  
*Attorney for Appellant, Charleston Advancement  
Academy High School*

CC Erik T. Norton, Esq. (via e-mail)  
Tyler R. Turner, Esq. (via e-mail)  
Mary Allison Caudell, Esq. (via e-mail)  
Ms. Nadine Deif (via e-mail)



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