

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas
Mikell R. Scarborough, Master-in-Equity

Appellate Case No.: 2022-001165
Trial Court Case No.: 2018-CP-10-05739

Michael D. Royal, Appellant,

v.

Free Kindergarten Association of Charleston, Respondent,
The Attorney General of the State of South Carolina and
The Charleston County School District, Respondents.

**RESPONDENT FREE KINDERGARTEN ASSOCIATION OF CHARLESTON'S
DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent Free Kindergarten Association of Charleston, designates the following to be included in the Record on Appeal:

1. Transcript of Trial on December 15, 2021
2. Summons and Complaint filed December 4, 2018
3. Answer of Free Kindergarten, filed January 7, 2019
4. SCAG Motion to Intervene, filed January 28, 2019
5. Charleston County School District Motion to Intervene, filed February 7, 2019
6. Order of Reference to Master, filed March 21, 2019
7. Master's Order Granting Motions to Intervene, filed June 7, 2019
8. Answer, Counterclaim, Crossclaim and Request for Declaratory Judgment of Charleston County School District, filed June 24, 2019
9. Free Kindergarten's Reply to Request for Declaratory Judgment of School District, filed July 1, 2019
10. Order Granting Motion of the Attorney General of the State of South Carolina to Intervene, filed July 10, 2019

11. South Carolina Attorney General Alan Wilson's Answer, filed July 25, 2019
12. Answer/Reply of SCAG to the Charleston County School District's Request for Declaratory Judgment, filed July 25, 2019
13. Order Granting Motion of Charleston County School District to Intervene, filed August 22, 2019
14. Order Appointing Receiver for Defendant Free Kindergarten Association of Charleston, Filed February 22, 2021.
15. Motion to Intervene of Charleston Chapter No. 4, UDC and the Confederate Museum, filed June 17, 2021
16. Order Granting Motion to Intervene, filed August 10, 2021
17. Stipulation of Dismissal of UDC and Confederate Museum, filed October 28, 2021
18. The Attorney General of the State of South Carolina's Pre-Trial Brief, filed December 6, 2021
19. The Attorney General of the State of South Carolina's Memorandum of Law, filed December 8, 2021
20. The Attorney General of the State of South Carolina's Pre-Trial Brief Supplement, filed December 14, 2021
21. SCAG Trial Exhibit 1
22. Order filed March 31, 2022
23. Plaintiff's Motion to Reconsider, filed April 8, 2022
24. Charleston County School District Motion to Exclude and Strike, filed April 8, 2022
25. Plaintiff's Amended Motion to Reconsider, filed April 10, 2022
26. Order Denying Plaintiff's Motion to Reconsider, filed July 18, 2022
27. Order Regarding Motion to Exclude and Strike, filed July 18, 2022
28. Free Kindergarten Articles of Incorporation
29. Free Kindergarten Certificate of Incorporation
30. Letter filed March 30, 2022 from Evan P. Williams to Julie J. Armstrong (5 page letter)

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

FREE KINDERGARTEN ASSOCIATION
OF CHARLESTON
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TABLE OF AUTHORITIES

IV. Conclusion

For the reasons set forth herein, the trial court should be affirmed.

Respectfully submitted,

By: s/Patrick F. Stringer
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Dated: June 12, 2023
Charleston, S.C.