

RECEIVED

Oct 16 2023

SC Court of Appeals

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

---

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, Intervenors/Respondents.

---

**PROOF OF SERVICE**

---

I certify that I have served the Final Brief of Appellant and Appellant's Final Reply Brief on the above-named Respondent and Intervenors/Respondents via email to their respective counsel of record, on October 16, 2023, containing the above-referenced documents as attachments in .pdf format, sent to the addresses shown below.

Patrick F. Stringer, Esq.  
Stringer and Stringer  
753 Folly Road  
P.O. Box 12370  
Charleston, SC 29422-2370  
pfstringer@yahoo.com

*Counsel for Respondent Free  
Kindergarten Association of Charleston*

Joseph K. Qualey, Esq.  
joequaley@qlawfirm.com  
William Z. Smith, Esq.  
wzsmith@qlawfirm.com  
Qualey Law Firm  
37 Broad Street  
Charleston, SC 29401

*Court-Appointed Receiver for Respondent Free  
Kindergarten Association of Charleston*

A. Bright Ariail, Esq.  
Law Office of A. Bright Ariail, LLC  
bright@brightariaillaw.com  
125 Wappoo Creek Drive  
Building E, Suite 202  
Charleston, SC 29412

Warren W. Ariail, Esq.  
warren@ariaillaw.com  
Ariail Law Firm, LLC  
125 Wappoo Creek Drive  
Building E, Suite 202  
Charleston, SC 29412

*Counsel for Intervenor/Respondent The  
Charleston County School District*

Mary Frances Jowers, Esq.  
Assistant Deputy Attorney General  
mfjowers@scag.gov  
Kristin Simons, Esq.  
Assistant Attorney General  
ksimons@scag.gov  
Office of the South Carolina Attorney General  
P.O. Box 11549  
Columbia, SC 29211

*Counsel for Intervenor/Respondent The Attorney  
General of the State of South Carolina*

Respectfully submitted,

s/Evan P. Williams

Jeffrey S. Tibbals            S.C. Bar No. 72628  
jst@bybeetibbals.com

Evan P. Williams            S.C. Bar No. 101981  
ewilliams@bybeetibbals.com

BYBEE & TIBBALS, LLC  
735 Johnnie Dodds Blvd., Suite 104  
Mt. Pleasant, SC 29464  
Telephone: 843.881.1623

*Counsel for Appellant Michael D. Royal*

RECEIVED

Oct 16 2023

SC Court of Appeals

BYBEE & TIBBALS

735 Johnnie Dodds Blvd. Suite 104  
Mount Pleasant, SC 29464

843.881.1623

[bybeetibbals.com](http://bybeetibbals.com)

Evan P. Williams  
[ewilliams@bybeetibbals.com](mailto:ewilliams@bybeetibbals.com)

October 16, 2023

**VIA E-MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**Re: *Michael D. Royal v. Free Kindergarten Association of Charleston, et al.*  
Appellate Case No. 2022-001165**

Dear Ms. Kitchings:

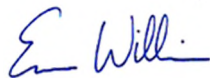
Please find enclosed for filing, on behalf of Appellant Michael D. Royal (“Appellant”), the following documents in the above-captioned matter:

1. Final Brief of Appellant with Certificate of Rule 211 Compliance;
2. Appellant’s Final Reply Brief with Certificate of Rule 211 Compliance; and
3. Proof of Service of the foregoing.

A hardbound copy of these documents is being sent to you with a copy of this letter via UPS.

By copy of their counsel of record on the filing transmittal e-mail, Respondent and Intervenor/Respondents are served with Appellant’s Final Brief and Final Reply Brief.

Yours Sincerely,



Evan P. Williams

Enclosures

cc (via e-mail only): Patrick F. Stringer, Esq. ([pfstringer@yahoo.com](mailto:pfstringer@yahoo.com))  
Joseph K. Qualey, Esq. ([joequaley@qlawfirm.com](mailto:joequaley@qlawfirm.com))  
William Z. Smith, Esq. ([wzsmith@qlawfirm.com](mailto:wzsmith@qlawfirm.com))  
Mary Frances Jowers, Esq. ([mfjowers@scag.gov](mailto:mfjowers@scag.gov))  
Kristin Simons, Esq. ([ksimons@scag.gov](mailto:ksimons@scag.gov))  
Warren W. Ariail, Esq. ([warren@ariaillaw.com](mailto:warren@ariaillaw.com))  
A. Bright Ariail, Esq. ([bright@brightariaillaw.com](mailto:bright@brightariaillaw.com))