

RECEIVED

Jul 18 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

\_\_\_\_\_  
Appellate Case No. 2023-000500  
\_\_\_\_\_

The School of Hope Christian Academy, Jacqueline McKie Burden,  
and Eugene Burden, Sr.,.....Appellants,

v.

South Carolina Department of Education, Ronald Jones,  
and Shirley Jenerette, .....Respondents.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

Pursuant to Rule 262(c)(3), SCACR, I, the undersigned, Counsel for Respondent South Carolina Department of Education, certify that I have served **Respondent South Carolina Department of Education’s Final Brief** on the following counsel of record by email on July 18, 2024.

W. Michael Duncan, Esquire (SC Bar 1162)  
DUNCAN AND HEYDARY LAW, PLLC  
2411 Pineview Drive  
Greensboro, North Carolina 27407  
(803) 315-4500  
mike.duncan@duncanandheydaryl.com

*Counsel for Appellants*

Albert R. Pierce, Jr., Esquire (SC Bar 70334)  
HOWSER NEWMAN & BESLEY, LLC  
1508 Washington Street  
PO Box 12009 (29211)  
Columbia, South Carolina 29201  
(803) 758-6000  
rpierce@hnblaw.com

*Counsel for Respondent Ronald Jones*

Page McAulay Kalish, Esquire (SC Bar 72611)  
PMK LAW, LLC  
141 Pelham Drive, STE F. No. 202  
Columbia, South Carolina 29209  
pmk@pmklawllc.com  
(803) 386-7644

*Counsel for Respondent Shirley Jenerette*

Respectfully submitted,

/s/ Sarah C. Frierson

Vordman Carlisle Traywick, III (102123)

Sarah C. Frierson (104643)

ROBINSON GRAY STEPP & LAFFITTE, LLC

2151 Pickens Street, Suite 500

Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

ltraywick@robinsongray.com

sfrierson@robinsongray.com

*Counsel for Respondent South Carolina Department  
of Education*

Columbia, South Carolina  
July 18, 2024

**From:** [Sarah Frierson](#)  
**To:** [Mike Duncan](#)  
**Cc:** [Lisle Traywick](#); ["Rick Pierce"](#); ["Page Kalish"](#); [Toni Hawkins](#)  
**Bcc:** ["{F443413}.Clients@f8eed.imanage.work"](#)  
**Subject:** School of Hope v. S.C. Dep't of Edu. (Appellate Case No. 2023-000500) - Respondent DOE's Final Brief  
**Date:** Thursday, July 18, 2024 12:02:36 PM  
**Attachments:** [image001.png](#)  
[image008.png](#)  
[Proof of Service of DOE's Final Brief\(39247084.1\).pdf](#)  
[FINAL Brief of Respondent SCDOE\(39247072.1\).pdf](#)

---

Good afternoon, Mike,

Pursuant to Rules 262(c)(3), SCACR, and *In re Methods of Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules*, App. No. 2020-000447, ¶ (d)(1) (S.C. Sup. Ct. filed May 6, 2022), attached for service upon you is Respondent South Carolina Department of Education's Final Brief as well as a Proof of Service being filed in the South Carolina Court of Appeals today.

Should you have any questions or concerns, please don't hesitate to contact us. Thank you.

Best Regards,

Sarah Frierson



---

**SARAH C. FRIERSON** ASSOCIATE

DIRECT 803.231.7829

**[VCARD](#)** **[VIEW BIO](#)**

**[ROBINSONGRAY.COM](#)**

2151 Pickens Street

Suite 500

PO Box 11449 (29211)

Columbia, SC 29201



**NOTICE:** This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please delete this message from your device.

**[Supporting Green](#)** print wisely.