

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

SEP 04 2024

SC Court of Appeals

Appeal From Cherokee County
Court of Common Pleas

Perry Gravely, Circuit Court Judge
R. Keith Kelly, Circuit Court Judge

Docket No.: 2017-CP-11-00735

Appellate Case No. 2022-001582

Sharon Brown,

Appellant,

vs.

Cherokee County
School District One,

Respondent.

**APPELLANT'S REPLY TO RESPONDENT'S MOTION TO
DISMISS APPELLANT'S APPEAL**

Appellant, Sharon Brown, hereby moves the Court to deny respondent's motion to dismiss appellant's appeal on the following grounds:

- (1.) Appellant did not willfully and knowingly commit the human errors and typographical errors in appellant's brief. Appellant contends that should be granted the opportunity to correct Appellant's Initial Brief and Designation of Matter to be Included In the Record on Appeal. Appellant's arguments will remain the same.

However, appellant is not waving her right to amend/modify her brief after viewing respondent's brief.

(2.) Appellant served her Initial Brief on Respondent in May (approx. 3 months ago) of this year. Respondent filed two extensions for time to file their initial brief. Now, August 23, 2024, the respondent is asserting deficiencies in Appellant's 18 page brief and Appellant's Designation of Matters to Be Included in the Record on Appeal. Upon belief, respondent law firm discovered the human errors and typographical errors a long time ago and could have notified appellant to correct them.

(3.) Respondent filed for an extension of time on June 13, 2024 to file their Initial Brief. **See Exhibit A.** Following the request for an extension, our Court of Appeals notified respondent on June 24, 2024 that they did not submit the fifty dollar filing fee for their motion. See Exhibit B. Respondent did not file their initial brief on June 24, 2024 when due, given that they did not have their filing fee at the Court of Appeals by the due date of their Initial Brief, which was June 24, 2024. Respondent submitted their fifty dollar motion fee on June 25, 2024 to our Court of Appeals. **See Exhibit C.** Now the hypocrites, claim that my case should be thrown out for not following court rules. The respondent needs to clean around its own house. Our Court of Appeals gave them the opportunity to correct their human error. However, respondent now wants the Court of Appeals to give me the death penalty (end my appeal).

Respectfully, Appellant prays that our Court of Appeals will grant her some time to correct the human errors and typographical errors in Appellant's Brief. As stated earlier, appellant's argument in her brief will remain the same.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Sharon Brown". The signature is written in black ink and is positioned above a horizontal line.

SHARON BROWN

216 Ardmore Road

Spartanburg, S.C. 29306

(864)-253-9975

sharon.brown21@yahoo.com

APPELLANT

August 29, 2024

EXHIBIT A

RECEIVED

Jun 13 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHEROKEE COUNTY
Court of Common Pleas

The Honorable R. Keith Kelly
Circuit Court Judge

Docket No. 2017-CP-11-00735
Appellate Case No. 2022-001582

Sharon Brown,

Appellant,

v.

Cherokee County School District,

Respondent.

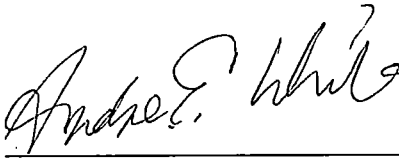
**MOTION FOR EXTENSION OF TIME FOR RESPONDENT TO FILE
RESPONDENT'S BRIEF TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 240(e), SCACR, Respondent, Cherokee County School District, moves for an extension of time in which to serve and file its Brief in this matter. Respondent requests an extension of thirty (30) calendar days to file its Brief, currently due on June 24, 2024. This is Respondent's first request for an extension.

The basis for this motion is that counsel for Respondent has scheduled vacation during the month of June. A thirty-day extension will not prejudice the rights of Appellant. We have notified the Appellant in writing this same date of our intent to file this Motion.

Based on the above, Respondent respectfully requests an extension of the deadline for filing and serving its Brief until July 24, 2024.

Respectfully submitted,

By: 

Andrea E. White (SC Bar No. 11891)
J. Alexander Sherard (SC Bar No. 103276)
WHITE & STORY, LLC
3614 Landmark Drive, Suite EF
P.O. Box 7036 (29202)
Columbia, SC 29204
T: 803.814.0993
F: 803.814.1183
awhite@sodacitylaw.com
asherard@sodacitylaw.com
Attorneys for Respondent

June 13, 2024
Columbia, South Carolina

EXHIBIT B



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

CATHERINE S. HARRISON
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

June 24, 2024

Mrs. Andrea Eaton White, Esquire
PO Box 7036
Columbia SC 29202

Mr. Joseph Alexander Sherard, Esquire
PO Box 7036
Columbia SC 29202

Re: Sharon Brown v. Cherokee County School District One
Appellate Case No. 2022-001582

Dear Counsel:

Upon reviewing your motion for an extension of time, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and this deficiency must be corrected within ten (10) days of the date of this letter or your filing will not be considered:

- The required filing fee has not been submitted. The correct filing fee is \$50.00.

Very truly yours,


CLERK

cc: Sharon Brown

EXHIBIT C

RE: Sharon Brown v. Cherokee County School District One (2022-001582)

From: Mendy Young (myoung@sodacitylaw.com)

To: msingleton@sccourts.org; awhite@sodacitylaw.com; asherard@sodacitylaw.com

Cc: sharon.brown21@yahoo.com

Date: Monday, June 24, 2024 at 04:01 PM EDT

Thank you and we apologize for the oversight. We will get that payment to you on Tuesday, June 25th.



Mendy Young
Paralegal

White & Story LLC

3614 Landmark Drive, Suite EF
P.O. Box 7036 (29202)
Columbia SC, 29204

O: 803-814-0993 | T: 803-626-1782

F: 803-814-1183

E: myoung@sodacitylaw.com

www.sodacitylaw.com

Please consider the environment before printing this email.

CONFIDENTIAL COMMUNICATION: The information contained in this message may contain legally privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or duplication of this transmission is strictly prohibited. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

IRS CIRCULAR 230 NOTICE: Any federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing, or recommending any transaction or matter addressed in this communication.

From: Singleton, Mary C. <msingleton@sccourts.org>

Sent: Monday, June 24, 2024 3:50 PM

To: Andrea White <awhite@sodacitylaw.com>; Alex Sherard <asherard@sodacitylaw.com>

Cc: Mendy Young <myoung@sodacitylaw.com>; Mendy Young <myoung@sodacitylaw.com>

Subject: Sharon Brown v. Cherokee County School District One (2022-001582)

Some people who received this message don't often get email from msingleton@sccourts.org. [Learn why this is important](#)

Dear Counsel:

Attached please find correspondence from the Court of Appeals. Any parties not included in this email will receive the attached correspondence by US Mail.

Do not respond to this email. Send all correspondence to ctappfilings@sccourts.org.

Sincerely,

Caitlyn Singleton

Senior Appeals Specialist

SC Court of Appeals

1220 Senate St.

Columbia, SC 29201

Ph: (803) 734-1890

F: (803) 734-1839

E-Filing Email: ctappfilings@sccourts.org

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

RECEIVED

CERTIFICATE OF SERVICE

SEP 04 2024

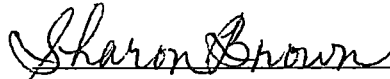
SC Court of Appeals

I, Sharon Brown, hereby certify that I have this 30th day of August served a copy of the herein below listed document to the address listed below by depositing a copy of same in the United States Postal System, postage prepaid, and mailing same to:

PLEADING(S): Appellant's Reply to Respondent's Motion to Dismiss Appellant's Appeal

PARTY SERVED:

Ms. Andrea E. White, Esq.  
Mr. J. Alexander Sherard, Esq.  
P.O. Box 7036  
Columbia, S.C. 29202

  
SHARON BROWN  
216 Ardmore Road  
Spartanburg, S.C. 29306  
sharon.brown21@yahoo.com  
(864)253-9975  
**Appellant**

August 30, 2024

**RECEIVED**

SEP 04 2024

SC Court of Appeals

South Carolina Court of Appeals  
ATTN: Jenny Abbott Kitchings, Clerk of Court  
P.O. Box 11629  
Columbia, S.C. 29211

Re: Sharon A. Brown, Appellant vs. Cherokee County School District One, Respondent.  
Docket No. 2017- CP-11-00735  
Appellate Case No: 2022-001582

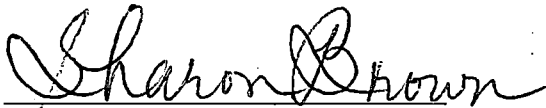
August 30, 2024

Dear Clerk of Court,

Enclosed you will find 1 (one) original and 6 (six) copies of *Appellant's Reply to Respondent's Motion To Dismiss Appellant's Appeal*. Also, you will find a Certificate of Service.

Please feel free to contact me if you have any questions.

Sincerely,



Sharon Brown  
**Appellant**

Enclosure(s)

Cc:

Ms. Andrea E. White/Mr. J. Alexander Sherard, Esquire

Sharon Brown  
216 Ardmore Rd.  
Spartanburg, S.C. 29306


B012

SHIP TO: PO BOX 11629  
COLUMBIA SC 29211-1629

USPS TRACKING® #



9500 1134 3517 4243 8752 92



**RECEIVED**  
SEP 04 2024  
SC Court of Appeals

South Carolina Court of Appeals  
ATT: Clerk of Court  
P.O. Box 11629  
Columbia, S.C. 29211