

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHEROKEE COUNTY  
Court of Common Pleas

The Honorable R. Keith Kelly  
Circuit Court Judge

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

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Sharon Brown,

Appellant,

v.

Cherokee County School District,

Respondent.

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**RESPONDENT’S MOTION FOR LATE FILING OF REPLY TO APPELLANT’S  
RETURN TO RESPONDENT’S MOTION TO DISMISS**

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Pursuant to Rule 240(e), SCACR, Respondent, Cherokee County School District (“the District”), submits this Motion for Late Filing of Respondent’s Reply to Appellant’s Return to the Motion to Dismiss (“Motion”). The District respectfully requests the Court grant the Respondent’s Motion for Late Filing of its Reply on appeal.

The ground for this Motion is the Respondent did not receive notice of the Appellant’s filing of the Return until September 4, 2024. (Attachment A). Appellant mailed a copy of her Return on Friday, August 30, 2024, via regular First-Class U.S. Mail. Respondent did not receive a copy of Appellant’s Return until September 4, 2024, which would be the Court deadline for filing

the Respondent's Reply. (Attachment A). Respondent will file and serve its Reply on Monday, September 9, 2024.

For good reason, respectfully requests the Court to consider its Reply when ruling on its Motion to Dismiss filed on August 23, 2024.

*Respectfully submitted,*



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Andrea E. White (SC Bar ID #11891)  
J. Alexander Sherard (SC Bar ID #103276)  
WHITE & STORY, LLC  
P. O. Box 7036 (29202)  
3614 Landmark Drive, Suite EF  
Columbia, South Carolina 29204  
T: (803) 814-0993  
F: (803) 814-1183  
[awhite@sodacitylaw.com](mailto:awhite@sodacitylaw.com)  
[asherard@sodacitylaw.com](mailto:asherard@sodacitylaw.com)  
*Attorneys for Respondent Cherokee County  
School District One*

September 6, 2024  
Columbia, South Carolina

**RECEIVED**

**Sep 06 2024**

**SC Court of Appeals**

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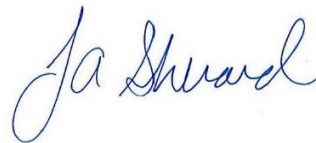
v.

Cherokee County School District One,

Respondent.

**CERTIFICATE OF COUNSEL**

This is to certify that Respondent Cherokee County School District One's Motion for Late Filing of Respondent's Reply to Appellant's Return to Motion to Dismiss complies with Rule 240(c), SCACR.



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, South Carolina 29204  
T: (803) 814-0993  
F: (803) 814-1183  
[awhite@sodacitylaw.com](mailto:awhite@sodacitylaw.com)  
[asherard@sodacitylaw.com](mailto:asherard@sodacitylaw.com)  
*Attorneys for Respondent*

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Columbia, South Carolina

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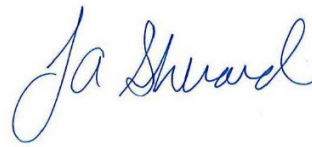
v.

Cherokee County School District One,

Respondent.

**PROOF OF SERVICE**

I certify that I have served *Respondent Cherokee County School District One's Motion for Late Filing of Respondent's Reply to Appellant's Return to Motion to Dismiss and Certificate of Counsel*, by emailing a copy to Appellant, Sharon Brown, to [Sharon.Brown21@yahoo.com](mailto:Sharon.Brown21@yahoo.com), and mailing a copy via First-Class U.S. Priority Mail (#9405530109355032970811).



Andrea E. White (SC Bar No. 11891)  
J. Alexander Sherard (SC Bar No. 103276)  
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3614 Landmark Drive, Suite EF  
P.O. Box 7036 (29202)  
Columbia, South Carolina 29204  
T: (803) 814-0993  
F: (803) 814-1183  
[awhite@sodacitylaw.com](mailto:awhite@sodacitylaw.com)  
[asherard@sodacitylaw.com](mailto:asherard@sodacitylaw.com)  
*Attorneys for Respondent*

September 6, 2024  
Columbia, South Carolina

Andrea E. White  
Ashley C. Story  
J. Alexander Sherard  
Michael D. Davidson  
Dylan A. Crossland  
Ryan K. Hicks



3614 Landmark Dr. Ste. EF  
P.O. Box 7036 (29202)  
Columbia, SC 29204  
Tel: 803.814.0993  
Fax: 803.814.1183  
www.sodacitylaw.com

J. Alexander Sherard  
[asherard@sodacitylaw.com](mailto:asherard@sodacitylaw.com)

September 6, 2024

**VIA EMAIL & PERSONAL COURIER**

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

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**Sep 06 2024**  
**SC Court of Appeals**

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

Dear Ms. Kitchings:

Please find the following documents for filing in the above-referenced matter:

- 1) Respondent's Motion for Late Filing of Respondent's Return;
- 2) Respondent's Proof of Service;
- 3) Respondent's Certificate of Counsel; and
- 4) \$50.00 filing fee.

If there are any issues with the filings, please let me know and I will take care of it before the close of business today.

Thank you for your assistance in this matter.

Sincere regards,

A handwritten signature in blue ink that reads 'Ja Sherard'.

J. Alexander Sherard

Enclosures

c: Andrea E. White, Esq. (w/o enclosures)  
Sharon Brown (Via email & USPS Priority Mail)