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**Feb 12 2025**

**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  
The Honorable Perry Gravely, Circuit Judge

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

Sharon Brown,

Appellant,

v.

Cherokee County School District One,

Respondent.

**RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD OF APPEAL**

The Respondent proposes the following be included in the Record on Appeal:

1. Appellant's Complaint, October 4, 2017
2. Appellant's Amended Complaint, December 8, 2017
3. Respondent's Answer and Affirmative Defenses to Amended Complaint, February 9, 2018
4. Respondent's Motion for Summary Judgment and Memorandum of Law in Support, March 19, 2021
5. Motion in Limine and Memorandum of Law in Support, September 3, 2021
6. Order Granting and Denying Respondent's Summary Judgment, September 10, 2021, Judge R. Keith Kelly
7. Appellant's Motion to Amend Order and Judgment and Motion for Reconsideration, September 16, 2021

8. Respondent's Memorandum of Law in Opposition to Motion to Amend Order, September 17, 2021
9. Motion to Bifurcate, August 28, 2022
10. Respondent's Motion for Summary Judgment and Supplemental Motion for Summary Judgment, September 23, 2022
11. Order Denying Appellant's Motion to Alter and Amend, October 10, 2022, Judge R. Keith Kelly
12. Order Bifurcating the Whistleblower Protection Cause of Action, October 19, 2022
13. Jury Verdict Form, October 26, 2022
14. *Brown v. Cherokee County School Board*, C/A No.: 2015CP110828 (7th Cir. Aug. 8, 2016) (order by Judge Hayes denying and dismissing Brown's appeal and affirming the decision of the school board). ("Hayes Cir. Ct. App. Order")
15. *Brown v. Cherokee County School District*, App. Case No.: 2017-001466 (Ct. App. Unpub. Op. 2020-UP-013) (Ct. App. May 5, 2020) (denying Brown's Petition for Rehearing and Rehearing *En Banc*) (S.C. Ct. App. Unpub. Order.).
16. *Brown v. Cherokee County School District*, App. Case No.: 2020-000919 (May 28, 2021)
17. *Brown v. Cherokee County School District*, U.S. Dkt. No.: 21-304 (Nov. 1, 2021) (denying petition for writ of certiorari); *Id.*, U.S. Dkt. No.: 21-304 (Jan. 10, 2022) (rehearing denied)
18. Transcript of Trial Proceedings held before Judge Perry Gravely, October 24, 2022, through October 26, 2022:
  - Pp. 1; 28-29; 63-64;
  - Pp. 116-117—Sharon Brown (Direct) Examination by Fletcher Smith;
  - Pp. 123; 126-127; 132; and 136-140--Sharon Brown (Cross) Examination by Andrea E. White;
  - Pp. 143-144—Sharon Brown (Redirect) Examination by Fletcher Smith;
  - Pp. 147—Dr. Carl Carpenter (Direct) Examination by Fletcher N. Smith;
  - Pp. 190; 200—Dr. Carl Carpenter (Cross) Examination by Andrea E. White;
  - Pp. 202-205—Dr. Carl Carpenter (Redirect) Examination by Fletcher N. Smith;
  - Pp. 217-228; 234-238; 275-278; 288; 296; 298-299; 317 (the Court).
19. Trial Exhibits:
  - Defendant's Exhibit 5, Letter dated August 11, 2015, Dr. Quincie Moore
  - Defendant's Exhibit 6, Cherokee County School Board Order
  - Defendant's Exhibit 13, Transcript of Beth Owens

(SIGNATURE AND CERTIFICATION ON FOLLOWING PAGE)

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



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February 12, 2025  
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