

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal From Cherokee County
Court of Common Pleas

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

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APR 09 2025
SC Court of Appeals

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 RETURN TO APPELLANT'S
MOTION TO AMEND INITIAL BRIEF**

Appellant, Sharon Brown, hereby moves the Court for an order to Amend her Initial Brief. In reply to the Respondent's Initial Brief the Appellant's asserts the following:

1. The Respondent district states, "Appellant filed seven motions for an extension of time to file her initial brief." In reply, Appellant asserts that Respondent District was aware of the fact that my mother was critically ill with cancer. Further, Respondent has been given at least 4 extensions by this Court. Two of the extensions granted were within the last few months.

2. Secondly, the respondent district states, "Appellant now seeks to amend her Amended Initial Brief for a second time, despite having already amended once and after the deadline for initial briefs has passed." In reply, Appellant amended her brief to correct clerical/typographical errors. Additionally, the Respondent District has missed two court deadlines. The Respondent District has been notified (deficiency letters) by this court about noncompliance with court rules.
3. Thirdly, the Respondent District claims that my motion is untimely and procedurally improper. Appellant contends that there is no rule that limits the number of times an appellant can amend their brief, as long as the amendment is deemed necessary to serve justice.

It was newly discovered that appellant's trial counsel did not make a formal objection to Cherokee County School District One's charge/accusation of unsatisfactory performance by the appellant in the classroom. Specifically, Appellant's trial counsel did not use the word "object" to respond to the charge/accusation that was withheld from Appellant. The withheld evidence was misconduct by the Respondent District and their Attorneys. Appellant's constitutional rights were violated during the trial.

4. Fourthly, the Respondent District claims that "Appellant has already amended her brief once." In reply, Appellant feels that the Respondent District robbed her of her day in Court (Court of Common Pleas). Now they are trying to stop justice from prevailing in this Court. The amendment that Appellant is seeking to add would not be prejudicial to the Respondent District. The Respondent District created this whole issue, by withholding charges/accusations from Appellant until the trial before Judge Gravely. The

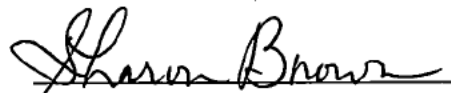
Respondent District has repeatedly undermined the teacher dismissal laws of the State of South Carolina.

5. Lastly, the Respondent District claims that they would be prejudiced by the amendment. The respondent district states, " If the Court were to allow this amendment, Respondent would be prejudiced, having already expended resources responding to the deficiencies in Appellant's Amended Initial Brief."

In reply, Appellant contends that she had expended resources and was prejudiced having to do another appeal concerning the Respondent District and their Attorney's egregious conduct in the lower Court. Appellant previously expended resources on legal fees at the lower Court during the time period that Respondent District pulled out of its hat a new charge/accusation during trial. Therefore, Appellant feels that this Court should not even entertain the resource issue advanced by the Respondent District.

Wherefore, Appellant moves the Court for an order to allow Appellant to Amend her Initial Brief.

Respectfully Submitted,



SHARON BROWN

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Spartanburg, S.C. 29306
(864)-253-9975
sharon.brown21@yahoo.com
APPELLANT

CERTIFICATE OF SERVICE

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I, Sharon Brown, hereby certify that I have this 7th day of April 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 Respondents Return To Appellant's Motion
To Amend Initial Brief

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
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(864)253-9975
Appellant

April 7, 2025

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

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

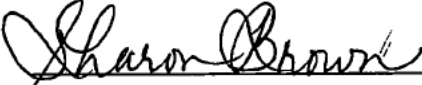
April 7, 2025

Dear Clerk of Court,

Enclosed you will find 1 (one) copy of Appellant's Reply to Respondent's Return To Appellant's Motion to Amend Initial Brief and 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

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