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**Jun 18 2025**

**SC Court of Appeals**

The State of South Carolina  
In The Court of Appeals

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APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

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Hon. Michael G. Nettles, 12<sup>th</sup> Circuit Court Judge

Case No. 2021-CP-21-022121

(Appellate Case No. 2024-001454)

Hannah L. Secka, Individually and (M.Y.N.S.)

Appellants-Plaintiffs

vs.

Florence School District One (FSD1) *and*  
Florence County Sheriff Department (FCSD)

Appellee-Defendants

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**DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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Appellant proposes the following be included in the Record on Appeal:

1. Order for September 4, 2024, by Judge Michael Nettles, 12<sup>th</sup> Circuit Court
2. Defense Memorandum in Support of Summary Judgment 2/21/2024
3. South Carolina Power of Attorney Granting Authority to (Hannah Secka)
4. Transcript of Hearing of Objection held on 8/21/2024 w/ Judge M. Nettles
5. Draft Complaint agreed upon by client-attorney on 2/18/2020

6. Complaint filed by Plaintiff Attorney Darryl C. Caldwell on 9/21/2021
7. Retaliation Complaint filed by FSD1 Case No. 4:21-cv-03746 on 11/16/2021
8. Pro se Motion to Dismiss enter Counterclaim filed 1/18/2022- 2/10/2023
9. Motion for Darryl Caldwell to Withdraw (*Ineffective Counsel*) 7/21/2024
10. US District Court of South Carolina Motion Granted 8/20/2024
11. Informal Reply Brief to 4<sup>th</sup> Circuit Courts Case No. 4:21-cv-03746
12. Opinion 4<sup>th</sup> Circuit Court Case No. 24-2005 decided 1/27/2025
13. Motion for Darryl Caldwell to be Relieved (*Legal Malpractice*) 9/17/2024
14. Office of Disciplinary Counsel Complaint Darryl C. Caldwell, Esq.
15. Expert Affidavit of Larry Jackson, Former FSD1 Superintendent 3/9/2024
16. Articles: Texas Teacher Writes “Focus” on Student with Permanent Marker
17. Article: Florence 1 Schools Sued Over Sexual Assault at School
18. Article: “*When did this become rape?*” `R. O’Malley: Lawsuit FSD1 superintendent didn’t take alleged sexual assault of student seriously
19. *Jane Doe v. Richard O’Malley Florence 1 Schools* Case No. 4:2024cv05305
20. (MYNS) Individual Educational Plan (IEP), Behavior Plan and Health Plans
21. Bruce Smith, SCDE IEP Facilitator, “Bullying” 2/11/2019
22. Social Security Administration “Fully Favorable Decision” Birth Injury
23. Private Placement for (MYNS) Safety @ (Riverside Military Academy)
24. SCHSL Complaint Football Participation Harassment Data 8/26/2019
25. Disability-based (HIB) Abuse & Neglect to O’Malley 8/1/2019
26. Letter to Richard O’Malley, FSD1 Superintendent 11/26/2019
27. Letter to Molly Spearman, SCDE of Abuse & Neglect of (M.Y.N.S.)
28. Prior Written Notice/Impact Statement 1/14/2019
29. Letter to Alan Wilson, AG Football Hazing of Autistic (M.Y.N.S.) 4/26/2019
30. Letter to Gov. Henry McMaster of Abuse & Neglect of (M.Y.N.S.)
31. Letter to FSD1 Board of Trustees of Abuse, Neglect, Assaults, and Hazing
32. FSD1 Grievances to BOT of Failure to Report School Crimes (M.Y.N.S.)
33. PowerPoint to SCDE of Harassment, Intimidation, Bullying, (HIB) Hazing, Abuse, Neglect, Assault & Battery, and Retaliation (M.Y.N.S.)
34. FCSD Report: Assault & Battery Case No. 2019-02-0194 (Exhibit 1-2)
35. FCSD Report: Abuse & Neglect Case No. 2019-06-0227 (Exhibit 3)
36. Letter to BOT WFHS Staff Misconduct 2/11/2020
37. Denial of Homebound Instruction for (M.Y.N.S.) 2020-2021 School Year
38. Gloria Jones, Advocate Discrimination & Retaliation to BOT 9/29/2021
39. Gloria Jones, Advocate Grievance of Brian Denny to BOT 10/1/2021
40. Grievance against Brian Denny & Richard O’Malley to BOT 10/22/2021
41. Hannah L. Secka Deposition 11/16/2022
42. Moudou-Yasen Secka Deposition 11/16/2022
43. Daisy Johnson Deposition 10/17/2023

44. Richard O'Malley Deposition 9/6/2023
45. Racial Justice Network, "State of Emergency" Letter 11/10/2023
46. Gov. Henry McMaster Response to Elder James Johnson 1/24/2024
47. Alexis Pipkins, BOT *Due Process Hearing #2* Testimony pg. 84-102
48. Due Process Hearing Transcript #1 Doug Dent, LHO 4/10-11/2019
49. Hearing Officer Denies Subpoena for Richard O'Malley/Bribery Invoice
50. Due Process Hearing Transcripts #2 Brian P. Murphy, LHO 10/22-23/2020
51. LabCorp Results for WFHS Drug Overdose 6/5/2019
52. Office of Civil Rights Letter/Resolution Agreement Case No. 11-19-1135
53. Office of Civil Rights Letter/Resolution Agreement Case No. 11-21-1211
54. Expert: Dr. Alexis Sanders, Bask Psychology Trauma Evaluation & Bills
55. Expert: Dr. Leah Pritchard-Boone Trauma Evaluation & Bills
56. SCSBA Board Policy: JI/JII/JICFA/JICFAA/JLF/GBE/GBEC/GCQF/KLGA
57. Department of Justice Complaint 12/3/2019 and 5/17/2021
58. Department of Juvenile Justice "Assault & Battery 3<sup>rd</sup> Degree" 5/18/2021
59. Florence County Sheriff Department Abuse 10/16/2019
60. Parent Letter to O'Malley Re: WFHS Drugs on Campus 10/1/2019
61. Christopher Coleman, WFHS AP "Assault/Harassment" 2019-2020
62. Visible Bodily Injuries Images (3)
63. James Williams, Advocate-LifeLine PLUS Testimony DPH#1 pg. 2-16
64. SC Department of Education State Complaint 11/26/2018
65. Dr. Sterling B. Harris Deposition & Affidavit 12/12/2023
66. Richard O'Malley Contract 5/9/2018