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Aug 18 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Florence County
The Honorable Michael G. Nettles
12th Judicial Circuit Court Judge
Trial Court Case No.: 2021-CP-21-02121

Appellate Case No.: 2024-001454

Hannah Secka individually and as parent and guardian for the minor, M.Y.S., Appellants,

v.

Florence County School District One and Florence County Sheriff's Department, Respondents.

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

David T. Duff, Esq.
Meredith L. Seibert, Esq

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Attorneys for Respondent

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Appellant, *pro se*

Pursuant to Rule 209, SCACR, Respondent designates the following material for inclusion in the record on appeal:

ORDERS

1. Order dated March 5, 2024 (granting SJM)
2. Order dated September 4, 2024 (denying MFR).

PLEADINGS

3. Summons and Complaint filed September 9, 2021.
4. Answer of Florence County School District One filed December 3, 2021.
5. Stipulation of Dismissal (Florence County Sheriff's Department) filed January 3, 2024.

TRANSCRIPTS

6. Hearing Transcript of Motion for Summary Judgement taken on February 20, 2024.
7. Hearing Transcript of Motion for Reconsideration taken on August 21, 2024.
8. Deposition Transcript of Moudou-Yasen Nasir Secka, including exhibits taken on November 16, 2022.
9. Deposition Transcript of Hannah J. Secka, including exhibits taken on November 16, 2022.
10. Deposition Transcript of Daisy Johnson, including exhibits taken on October 17, 2023.
11. Deposition Transcript of Dr. Sterling Harris, including exhibits taken on December 12, 2023.

MOTIONS

12. Motion to Compel Discovery filed December 13, 2021.
13. Respondents' Motion and Memorandum in Support of Summary Judgment filed October 23, 2023, including corresponding exhibits.
14. Appellants' Memorandum of Law in Opposition to Respondent's Motion for Summary Judgment filed February 20, 2024, including corresponding exhibits.

15. Appellants' Motion for Reconsideration filed March 14, 2024.
16. Respondent's Response to Motion for Reconsideration filed March 20, 2024.
17. Appellants' Motion to Relieve Counsel (Caldwell) filed September 14, 2024.
18. Appellants' Notice of Appeal filed September 18, 2024.

Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to the appeal.

Respectfully Submitted:

DUFF | FREEMAN | SEIBERT, LLC

By: *s/Meredith L. Seibert*

David T. Duff, Esq., (SC Bar #1768)
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Florence County School District One and Florence County Sheriff's Department, Respondents.

CERTIFICATE OF SERVICE

The undersigned of Duff Freeman Seibert, LLC, hereby certifies that s/he has caused the following party of record to be served with the foregoing, *Respondent's Designation of Matter to be Included in the Record of Appeal*, in the above-captioned matter, by electronic/e-mail, and by mailing a copy of same, postage prepaid and return address clearly indicated, on this 18th day of August 2025:

Hannah L. Secka
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hannsc2@aol.com

I further certify that all parties required by the Rule have been served.

By: s/Meredith L. Seibert
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