

Dec 01 2025

ELECTRONICALLY FILED - 2022 Sep 17 6:47 AM - CHEROKEE - COMMON PLEAS - CASE#2017CP1100735

STATE OF SOUTH CAROLINA  
COUNTY OF CHEROKEE

IN THE COURT OF COMMON PLEAS  
SEVENTH JUDICIAL CIRCUIT

Sharon Brown,

C.A. No.: 2017-CP-11-00735

Plaintiff,

**DEFENDANT'S MEMORANDUM  
IN OPPOSITION TO PLAINTIFF'S  
MOTION TO AMEND ORDER AND  
JUDGMENT AND MOTION FOR  
RECONSIDERATION**

v.

Cherokee County School District,

Defendant.

Defendant Cherokee County School District ("the District") submits this Memorandum of Law in Opposition to Plaintiff's Motion to Amend Order and Judgment and Motion for Reconsideration of the

that the Court erred in g  
factual designations in th  
dissatisfaction with the

*Item # 8  
Respondent's Memorandum  
of Law in Opposition  
to Motion to Amend  
Order, Sept. 17, 2022*

ff has not, and cannot, show  
mary Judgment, or that any  
id, Plaintiff merely expresses  
d for relief under Rule 59(e).

On March 19, 20  
of Law in Support of  
Plaintiff's Response and

Judgment and Memorandum  
ary Judgment"). Following  
g supplemental memoranda,

to the District's Motion for Summary Judgment ("Response in Opposition"), the Court parties heard oral arguments on March 29, 2021, with the Honorable R. Keith Kelly presiding.

On April 6, 2022, Judge Kelly directed the District's counsel to draft and provide the Court with a proposed order granting in part and denying in part the District's Motion for Summary

<sup>1</sup> The District incorporates by reference its Motion for Summary Judgment and accompanying Memorandum of Law.

STATE OF SOUTH CAROLINA

COUNTY OF CHEROKEE

SHARON BROWN,

Plaintiff,

v.

CHEROKEE COUNTY SCHOOL DISTRICT,

Defendant.

IN THE COURT OF COMMON PLEAS SEVENTH JUDICIAL CIRCUIT

CASE NO.: 2017-CP-11-00735

NOTICE OF MOTION AND SUPPLEMENTAL MOTION FOR SUMMARY JUDGMENT BY DEFENDANT CHEROKEE COUNTY SCHOOL DISTRICT

TO: FLETCHER N. SMITH, ESQUIRE, ATTORNEY FOR PLAINTIFF:

YOU WILL PLEASE TAKE NOTICE that Defendant Cherokee County School District ("the District") by and through its undersigned counsel, and pursuant to Rule 56, SCRCP, will

move before the presiding Judge of the Seventh Judicial Circuit, at the Cherokee County Courthouse, hereof, or as soon thereafter as court is in session, for summary judgment in its favor as to Plaintiff's causes of action, to-wit: Fraudulent Intent set forth against it in the Complaint.

Item # 10 Respondent's Motion for Summary Judgment and Supplemental Motion for Summary Judgment, September 23, 2022

h Judicial Circuit, ) day after service of summary judgment in support of Contract with Plaintiff. Plaintiff filed

On March 19, 2022, the District filed its Motion for Summary Judgment in Opposition to the District's Motion for Summary Judgment.

accompanying memoranda in support and opposition, respectively, to the District's Motion for Summary Judgment. On March 29, 2022, the Court heard oral arguments by the District and Plaintiff in support and opposition, respectively, to the District's Motion for Summary Judgment.

On March 29, 2022, the Honorable Judge R. Keith Kelly issued an Order granting in part and