

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

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND SCHOOL DISTRICT TWO BOARD
APPEAL FROM RICHLAND COUNTY

The Honorable Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2013-002436

STUDENT #1 JOHN DOE;
MOTHER of Student #1 John
Doe

Appellants,

v.

Richland School District Two
Board of Trustees; Katie
Brochu, PhD in her official
capacity as District
Superintendent

Respondants.

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

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

1. Order of October 2, 2013 Denial of Plaintiff's Motion to Alter and Amend Order of August 12, 2013
2. Order July 30, 2013 Order Granting Defendants Motion to Dismiss with prejudice
3. Order of December 28, 2012 Denial of Temporary Injunction
4. Order of February 11, 2013 Denial of Motion to Alter and Amend
5. Order of South Carolina Court of Appeals Dismissing Glenn Bowens
6. Order of October 2, 2013 South Carolina Court of Appeals Dismissing Appeal from Circuit Court .

RECEIVED

MAY 07 2014

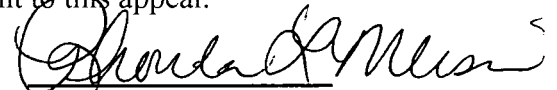
SC Court of Appeals

7. Second Amended Complaint/Appeal
8. Answer to Second Amended Complaint/Appeal
9. Transcript of Temporary Restraining Order Hearing of November 28, 2013
10. Transcript of Motion to Dismiss Hearing of January 30, 2013
11. Plaintiff's Memorandum in Support of Temporary Restraining Order
12. Affidavit of Ralph Schmidt including Attachments #1 and #2.
13. Defendants Memorandum of Law in Opposition of Plaintiff's request for Temporary Restraining Order including Attachments #1 and #2
14. Motion to Dismiss Second Amended Complaint.
15. Motion for Temporary Restraining Order.
16. Affidavit of Rhonda Meisner Filed November 26, 2013 accompanied by letter from Richard Winn Academy and University of Denver
17. Plaintiff's Memorandum in Opposition of Motion to Dismiss November 21, 2013
18. Second Amended Complaint Filed November 13, 2014
19. Certificate of Service October 22, 2012
20. Redacted email to Fred McDaniel and Board of Trustee's labeled EXHIBIT #1
21. Foundations for understanding the Social-Emotional needs of the highly gifted.(Davidson Institute).
22. Letter from Father of Student #1 to Dr. McDaniel
23. South Carolina Gifted and Talented Best Practices Manual prepared by the South Carolina Department of Education May 2006 Edition.
24. Plaintiff's Memorandum in Support of Temporary Restraining Order.
25. Defendants Memorandum in Opposition of Plaintiff's Request for Temporary Restraining Order including attachments #1 and #2.
26. Plaintiff's Motion to Alter and Amend Judgment dated August 12, 2013
27. Defendants proposed Order Denying Temporary Injunction.
28. Plaintiff's proposed Order Denying Temporary Injunction.
29. Plaintiff's proposed Order Approving Temporary Injunction.
30. Faxed letter from Mother of Student #1 Dated December 19, 2012 objecting to language in Defendants proposed TRO Order.
31. Motion to Alter and Amend Order in Temporary Restraining Order
32. Plaintiff's Memorandum of Law in opposition to Motion to Dismiss
33. Plaintiff's Motion for relief of Judgment dated February 19, 2013
34. Plaintiff's motion to alter and amend Motion and Relief of Judgment dated February 26, 2013.
35. Plaintiff's Reply to Defendants Memorandum in Opposition of Motion for Relief of Judgment filed March 15, 2013
36. Affidavit of Glenn Bowens, Esq.
37. Affidavit of Rhonda Meisner filed January 18, 2013 with attached envelope.
38. Defendants Memorandum of Law in support of their Motion to Dismiss Second Amended Complaint.
39. Affidavit of Rhonda Meisner filed March 15, 2013
40. Defendants Memorandum of Law in Opposition to Plaintiff's Motion for Relief of Judgment including Exhibits #1 and Exhibit #2

41. Notice of Appeal Filed March 15, 2013
42. Notice of Appeal Dated November 8, 2013
43. Letter to Mother from Chief Academic Officer of Richland School District Two.

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

May 7, 2014



Rhonda Meisner
Post Office Box 689
Blythewood, South Carolina
29016
(803) 960-3696
pegasus@nuvox.net

**PROOF OF SERVICE INITIAL BRIEF AND DESIGNATION OF
MATTER ON APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge Presiding Judge

Appellate Case No. 2013-2436

Student #1 John Doe,
REDACTED NAME OF
STUDENT; Mother of
Student #1 John Doe,
REDACTED NAME OF
MOTHER

Appellants,

v.

Board of Trustees, Richland
School District Two;
Superintendant of School
District Two, Dr. Katie
Brochu, in her official
capacity

Respondents.

RECEIVED

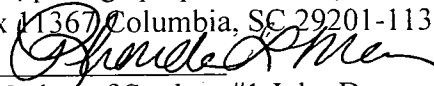
MAY 07 2014

SC Court of Appeals

PROOF OF SERVICE

I certify that I have served a copy of the initial brief and designation of matter in the above appeal and served a copy on the Court of Appeals via hand delivery and on Tyler Ryan Turner, Kathryn Long Mahoney and John Marshall Reagle of the Law firm Childs and Halligan, PA by depositing a copy of it in the United States Mail, postage prepaid, on May 7, 2014, addressed to Childs and Halligan, PA Post Office Box 11367 Columbia, SC 29201-11367 Attorneys for the Respondents.

May 7, 2014


Mother of Student #1 John Doe
Post Office Box 689
Blythewood, South Carolina 29016
(803) 960-3696 pegasus333@icloud.com
Appellant and Mother of Appellant