

YCR LAW
Young Clement Rivers, LLP

Russell G. Hines
Associate

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1327
E-mail: RHines@ycrlaw.com

July 17, 2014

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
P O. Box 11629
Columbia, SC 29211

RECEIVED

JUL 18 2014

SC Court of Appeals

Re: Jane Doe vs. Charles Smith et al.
Appellate Case No.: 2013-000084
Circuit Case No.: 2010-CP-10-7699
Claim No.: 46138
YCR File: 2235-20080353

Dear Ms. Kitchings:

With the approval and authorization of Robin L. Jackson, Esquire, for whom I have signed below, I write on behalf of **all Respondents** to the above-referenced appeal (i.e., our firm's clients, Respondents Charleston County School District and James Island High School, as well as Ms. Jackson's firm's client, Respondent Charles Smith).

The Respondents are in receipt of Appellant Jane Doe's Petition for Rehearing.

The Respondents believe that the Court's unanimous decision, Doe v. Smith, Op. No. 2014-UP-267 (S.C. Ct. App. filed June 30, 2014) (unpublished opinion), is well-reasoned and just, and, respectfully, that the Court's decision is not undermined or otherwise called into question by the argument that the Appellant presents in her petition. The Respondents would also draw the Court's attention to our Supreme Court's decision in Arnold v. Carolina Power & Light Company, 168 S.C. 163, 172-73, 167 S.E. 234, 238 (1993) ("The purpose of . . . a petition [for rehearing] is to aid the court in deciding correctly a case heard by it. The petition must show, according to the rule, 'the points supposed to have been overlooked or misapprehended by the Court.' The purpose of a petition for rehearing is not to have presented points which lawyers for the losing parties have overlooked or misapprehended, and the purpose of a petition for rehearing is not just to have the case tried in this court a second time."); accord Kennedy v. S.C. Retirement Sys., 349 S.C. 531, 532, 546 S.E.2d 322 (2001).

Therefore, in response to the Appellant's petition, the Respondents incorporate by reference their prior briefing and argument, but do not intend to file a more formal return unless the Court so directs. See Rule 240(e), SCACR ("[A] return to a petition or motion for rehearing under Rule 221 need not be filed unless requested by the court."). To the extent that the Court requires or would

VIA U.S. MAIL

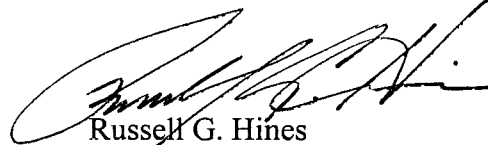
The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
July 17, 2014
Page 2 of 2

appreciate such a return(s) to the petition, the Respondents will, of course, gladly comply with the Court's instructions.

With best wishes and kindest regards, we are

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines
Attorneys for Respondents
Charleston County School District and
James Island High School

-and-

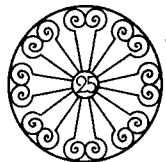
SENN LEGAL, LLC



Robin L. Jackson
Attorneys for Respondent Charles Smith

RGH/

cc: (All Via U.S. Mail)
Lawrence E. Richter, Jr., Esquire, The Richter Firm, LLC
Alice Richter Lehrman, Esquire, The Richter Firm, LLC
Aaron E. Edwards, Esquire, The Richter Firm, LLC
Robin L. Jackson, Esquire, Senn Legal, LLC



YCR LAW

Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400
PO Box 993
CHARLESTON, SC 29402

RECEIVED

JUL 18 2014

SC Court of Appeals

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P O. Box 11629
Columbia, SC 29211

Hasler

FIRST-CLASS MAIL

07/17/2014

US POSTAGE

\$000.48⁰



ZIP 29401
011D12603180

SLB

2235-20080353

2921181629 BC 12

