

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

JUL 20 2015

SC Court of Appeals

Maité Murphy, Circuit Court Judge

Civil Action No.: 2014-CP-31-227

Laura Toney.....Respondent,

v.

Lee County School District.....Appellant.

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

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

Respondent's (Toney) Memorandum in Opposition to Motion in Limine (w/attachments) dated April 28, 2014, received by the Board June 7, 2014 (sealed)

Respondent's (Toney) Petition for Reconsideration to the Board (w/attachments) dated August 8, 2014

Appellant's (Toney) Notice of Appeal to the Circuit Court dated August 28, 2014

Circuit Court Hearing of October 31, 2014, Transcript pages: 7-10, 12-14, 37

Appellant's (Toney) Memorandum to Circuit Court (w/attachments) dated October 29, 2014

Appellant's (Toney) Response to Motion for Reconsideration dated January 27, 2015

Board Hearing Transcript pages: 53, 54, 58, 59, 72-76, 77, 81, 111, 112, 121, 122, 127-131, 134, 135, 152, 153, 188, 189, 218-225, 229-234, 236-

244, 249-252, 320, 337, 338, 345-347, 390, 391-397, 436-439, 442-444,  
449, 450, 452-454, 456

Toney Exhibit Tabs 1, 4, 7 (sealed), 9, 11 and 12

“Teacher B” deposition pp. 14, 19-21, 30, 33, 36, 41-43, 55-60, 62  
(sealed)

“Teacher B” deposition Exhibits 3 and 4 (sealed)

Toney Exhibit 1 from July 1, 2014 hearing

Toney Exhibit 10 from July 8, 2014 hearing

Counsel for Appellant has stipulated that its Board hearing designations, including any deposition excerpts, shall be confined to testimony and records presented for review by the Board.

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

NICKLES LAW FIRM, LLC

BY: 

W. Allen Nickles, III, SC Bar #4226

Susan M. Fittipaldi, SC Bar #14225

1122 Lady Street, Suite 610

Columbia, South Carolina 29201

(803)779-8080

[wanickles@nickleslaw.com](mailto:wanickles@nickleslaw.com)

[sfittipaldi@nickleslaw.com](mailto:sfittipaldi@nickleslaw.com)

*Attorneys for Respondent*

July 10, 2015  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

JUL 20 2015

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

SC Court of Appeals

Maité Murphy, Circuit Court Judge

Civil Action No.: 2014-CP-31-227

Laura Toney.....Respondent,

v.

Lee County School District.....Appellant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served the foregoing Respondent's Initial Brief and Designation of Matter by depositing a copy of same in the United States Mail, postage prepaid and addressed as follows:

Charles J. Boykin, Esquire  
Deidre D. Laws, Esquire  
Boykin & Davis, LLC  
P. O. Box 11844  
Columbia, South Carolina 29211

This 20<sup>th</sup> day of July, 2015.

NICKLES LAW FIRM, LLC

BY: 

W. Allen Nickles, III, SC Bar #4226  
Susan M. Fittipaldi, SC Bar #14225  
1122 Lady Street, Suite 610  
Columbia, South Carolina 29201  
(803)779-8080  
[wanickles@nickleslaw.com](mailto:wanickles@nickleslaw.com)  
[sfittipaldi@nickleslaw.com](mailto:sfittipaldi@nickleslaw.com)

*Attorneys for Respondent*