

STATE OF SOUTH CAROLINA  
COURT OF APPEALS

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JUL 23 2015

SC Court of Appeals

APPEAL FROM SOUTH CAROLINA ADMINISTRATIVE LAW COURT

John D. McLeod, Judge

Case No. 2014-002372

Lake City College Preparatory Academy (LCCPA) ..... Appellant,

V.

South Carolina Public Charter School District (SCPCSD) ..... Respondent.

**RETURN TO MOTION TO DISMISS OF THE RESPONDENT  
AND CORRECT THE RECORD ON APPEAL**

Erik T. Norton  
Nelson, Mullins, Riley & Scarborough, LLP  
1320 Main Street, Meridian Building  
Columbia, South Carolina 29201  
*Counsel for Respondent*

Johnny Watson, Sr.  
Watson Law Firm  
2715 Edgewood Avenue  
PO Box 2305  
Columbia SC 29204  
*Counsel for Appellant*

Appellant respectfully ask the court to deny the request and allow this appeal process to the run its course so the issues presented can be resolved on the merits as is the preference in the case law of this state.

In its motion to Dismiss the Respondent makes the following three assertions:

1. "By letter dated June 30, 2015, this Court directed the Appellant to correct its Final Brief and Final Reply Brief within 10 days. The Appellant failed to do so, failing to follow the Court's Rules for a second time ...".

**RESPONSE:** The Appellant has made every effort to comply with all Rules and orders of this Court. Court rules allow for documents due on certain days to be filed the following Monday and the Appellant has abided by those rules. This court has considered all issues as they arose in this case on an individual basis and issued orders accordingly including changing and/or amended due dates as is within the Court's disgression. The Respondent seeks to have this review its previous decisions.

2. "... the Record on Appeal is replete with errors. For example, pages are out of order or missing, such as pages 212 and 213 ....".

**RESPONSE:** If during the reproduction process pages got left out or other errors occurred the Appellant apologizes and will make any corrections needed.

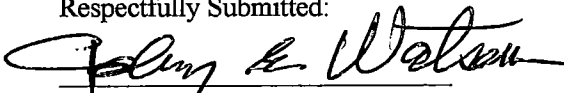
3. "The Record on Appeal also includes confidential information by Appellants in the Record on Appeal".

**RESPONSE:** Volume IV was included by the Respondent during the hearing process and it is included in the Record on Appeal at the Administrative Law Court. We only submitted what was submitted to us by the Respondent. However, we will make any redactions that are needed.

Therefore, the Appellant request that this request be denied and the appeal be allowed to run its course on the merits.

Respectfully Submitted:

By:



Johnny Watson, Sr.  
Watson Law Firm  
2715 Edgewood Avenue  
PO Box 2305  
Columbia SC 29204  
*Counsel for Appellant*

Columbia, South Carolina  
Dated: July 23, 2015

CERTIFICATE OF SERVICE


I, Johnny E. Watson, Attorney for the Lake City College Preparatory Academy (LCCPA),

hereby certify that I have served the individual named below with a copy of the document described herein by depositing it in the U. S. Mail, postage prepaid, to the person named at the address listed herein below:

PERSON SERVED: Erik T. Norton  
Attorney for the SCPCSD  
1320 Main Street, Meridian Building  
Columbia, South Carolina 29201

DOCUMENT: Return to Motion to Dismiss or Alternatively to Require a Corrected Record on Appeal.

DATE SERVED: July 23, 2015



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Johnny E. Watson, Attorney for Appellant

Columbia, South Carolina

Date: July 23, 2015

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