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The State of South Carolina
In The Court of Appeals

Appeal from Charleston County
Hon. R. Markley Dennis, Jr., Circuit Court Judge

RECEIVED

SEP 01 2015

Case No. 2011-CP-10-9200

SC Court of Appeals

Mother Doe A, Appellant

v.

The Citadel, Respondent

And

Case No. 2013-CP-10-10330

John Doe 201 and Jane Doe 201, Appellants

v.

The Citadel, Respondent

Notice of Appeal

Plaintiffs Mother Doe A, John Doe 201 and Jane Doe 201 hereby appeal an order of the Honorable R. Markley Dennis, Jr., granting summary judgment to the Defendant The Citadel in civil action 11-CP-10-9200, which by stipulation also ends civil action 13-CP-10-10330.

Notice of the order (dated May 29, 2015) was received Thursday, June 4, 2015, and a motion pursuant to SCRCP 59(e), was filed in response to that order on Monday, June 15, 2015. The notice that the Rule 59 motion had been denied was received through means of a mailing sent on Friday, August 7, 2015, and received by counsel August 13, 2015. The order in the case of Mother Doe A denying the Rule 59 motion was filed August 6, 2015. The parties had

stipulated that the rationale of the order in the case brought by Mother Doe A applied to the claims of the Doe 201 parents.

Attached to this notice is a copy of each of the various orders and notices referred to above in the Mother Doe A case, arranged in chronological order.

Respectfully submitted,



Gregg Meyers, SC Bar No. 9908
Jeff Anderson & Associates, P.A.
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Pierce, Hems, Sloan & Wilson
PO Box 22437
Charleston SC 29413-2437

Other counsel of Record:

M. Dawes Cooke
Barnwell Whaley Patterson & Helms
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Appeal from Charleston County
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Case No. 2011-CP-10-9200

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Proof of Service

I hereby affirm that I have served upon counsel for the defendant/respondent a copy of

Notice of Appeal, with attachments

by causing a copy of the document to be placed in the United States mails, first-class postage pre-paid wrapper, properly addressed to:

M. Dawes Cooke
Barnwell, Whaley, Patterson & Helms
PO Drawer H
Charleston SC 29402

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SC Court of Appeals

Done August 26, 2015

A handwritten signature in black ink that reads "Gregg Meyers". The signature is written in a cursive style with a large, stylized "G" and "M".

Gregg Meyers

Jeff Anderson & Associates, P.A.

366 Jackson Street Suite 100

Saint Paul, MN 55101

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JEFF ANDERSON & ASSOCIATES PA
REACHING ACROSS TIME FOR JUSTICE

August 26, 2015

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

RECEIVED
SEP 01 2015
SC Court of Appeals

Re: Appeal of Order in Mother Doe A v. The Citadel
Case No. 2011-CP-10-9200
(Charleston County, Hon. R. Markley Dennis, Jr.),
also affecting John Doe 201 and Jane Doe 201 v. The Citadel
Case No. 2013-CP-10-10330.

Dear Ms. Kitchings:

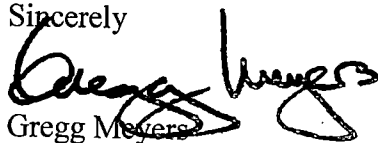
Enclosed for filing is a Notice of Appeal in the case captioned above. Also enclosed are the following:

1. Proof of Service on counsel for the Respondent of the Notice of Appeal;
2. Copy of the orders from which appeal is taken;
3. Filing fee of \$100;
4. Copy of the letter to the clerk of the lower court filing the notice of appeal; and,
5. Copy of a letter to the court reporter ordering the transcript of the proceedings below.

Note that the Order from case 11-CP-10-9200 by stipulation also affects the claims made in 13-CP-10-10330, John Doe 201 and Jane Doe 201 v. The Citadel.

Please file this Notice with the Court. Thank you very much.

Sincerely



Gregg Meyers
gregg@andersonadvocates.com

Enclosure

cc: Mr. Cooke, Attorney for Respondent

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JEFF ANDERSON & ASSOCIATES PA
REACHING ACROSS TIME FOR JUSTICE

August 26, 2015

Honorable Julie A. Armstrong
Clerk of Court
Charleston County Circuit Court
100 Broad Street
Charleston SC 29401

Re: Appeal of Order in Mother Doe A v. The Citadel,
Case No. 2011-CP-10-9200
(Charleston County, Hon. R. Markley Dennis, Jr.)
also affecting John Doe 201 and Jane Doe 201 v. The Citadel
Case No. 2013-CP-10-10330.

Dear Julie:

Enclosed for filing is a Notice of Appeal in the case captioned above. Judge Harrington issued one Order applicable to each of these cases, but there are four cases in your files. Also enclosed are the following:

1. Copy of the Proof of Service on counsel for the Respondent of the Notice of Appeal;
2. Copy of the Orders from which appeal is taken; and,
3. Copy of the letter to the Clerk of the Court of Appeals.

Note that the Order from case 11-CP-10-9200 by stipulation also affects the claims made in 13-CP-10-10330, *John Doe 201 and Jane Doe 201 v. The Citadel*, which should be noted as also being on appeal.

Please file this Notice with the Court.

Thank you very much, and best personal regards.

Sincerely



Gregg Meyers
gregg@andersonadvocates.com

Enclosure

cc: Mr. Cooke, Attorney for Respondent

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JEFF ANDERSON & ASSOCIATES PA
REACHING ACROSS TIME FOR JUSTICE

August 26, 2015

Deborah Garrison, RPR
Circuit Court Reporter
PO Box 27145
Greenville, SC 29616

Re: Mother Doe A v. The Citadel, No. 2011-CP-10-9200

Dear Ms. Garrison:

The South Carolina Supreme Court has you listed as the reporter for the proceedings before Judge Dennis that began on Monday, January 26 in this case, and their listing fits with my recollection. We spent that Monday picking a jury and Tuesday morning, when we expected to begin the trial, Judge Dennis reversed himself and issued a ruling granting summary judgment for the Defendants.

I am told that the transcript has already been ordered by my co-counsel at Pierce, Hens, Sloan & Wilson, in Charleston. So this may be duplicative, and of course we need only one copy of the transcript. I write, though, to clarify that we may need the entire proceedings of that week for this case, meaning the proceedings of both Monday and Tuesday, not only the ruling portion on Tuesday. So this is to confirm that we are requesting the transcript of the proceedings from their beginning on Monday until Judge Dennis gave us his ruling.

Of course I will be responsible for the fees associated with that transcript. Please consider this my order for the transcript.

Best personal regards.

Sincerely,

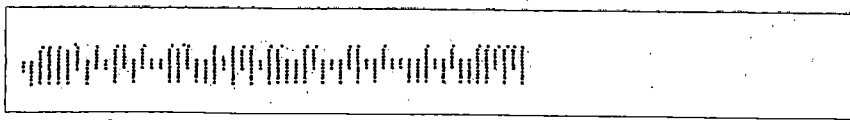
Gregg Meyers
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GM/tld

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