

APPEAL FROM DILLON COUNTY  
Court of Common Pleas

The Honorable Paul M. Burch  
Circuit Court Judge

Case No. 2013-CP-17-220  
Appellate Case No. 2015-000163

**RECEIVED**  
OCT 09 2015  
SC Court of Appeals

Antonia Graves.....Appellant,

v.

Dillon County Board of Education, Dillon County School District Four,  
Richard Schafer, James McRae, Ray Rogers, Arthur McMillan,  
Amanda Hayes, and Clareth Whitfield.....Respondents

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

Respondents propose the following be included in the Record on Appeal:


1. Order dated December 31, 2014, filed January 6, 2015;
2. First Amended Complaint;
3. Defendants Dillon County Board Of Education, Dillon County School District Four, Richard Schafer, James McRae, Ray Rogers, Arthur McMillan, Amanda Hayes, and Clareth Whitfield's Answer to Plaintiff's First Amended Complaint;
4. Motion for Summary Judgment by Defendants, dated July 29, 2014;
5. Memorandum of Law in Support of Motion for Summary Judgment by Defendants, dated September 2, 2014;
6. Plaintiff's Opposition to Defendants' Motion for Summary Judgment, dated August 28, 2014;
7. Plaintiff's Memorandum in Opposition to the Defendants' Motion for Summary Judgment, dated September 3, 2014;
8. Supplemental Memorandum of Law in Support of Defendants' Motion for Summary Judgment, dated October 8, 2014;
9. Plaintiff's Supplemental Memorandum in Opposition to the Defendants' Motion for Summary Judgment, dated October 7, 2014;
10. Transcript of Proceedings on September 3, 2014; and
11. All deposition excerpts, exhibits, and affidavits attached to the parties' memoranda of law or submitted to the trial court at the hearing by the Plaintiff and the Defendants, consisting of the following:

- a. Deposition of Antonia Graves (11/11/13), pages 1, 23, 25, 39, 41, 57-58, 92, 108-22, 141-44, 146, 153-54, 169-70, 172, 176, 179, 187-88, 190-95, 211-24, 227-32, 234, 251-52, 254-55, 267, 276, 278-82, 284, and Exhibits 2, 3, 4, 6, 7, 8, and 9;
- b. Deposition of Antonia Graves (12/16/13), pages 1-2, 45, 83, 91, 151-52, and 156-67;
- c. Deposition of Antonia Graves (1/16/14), pages 1, 82, 85, 93, 99-101, 103-04, 108, 113-14, 122-34, 136, 140, 145-46, and 165-66;
- d. Deposition of Alice Grice (2/11/14), pages 1-2, 20-22, and 24-29;
- e. Deposition of Ray Rogers (6/11/14), pages 1, 35-41, 49-51, and 62-64;
- f. Deposition of Claretha Whitfield (6/11/14), pages 1, 20-22, and 24-47;
- g. Deposition of James McRae (8/25/14), pages 1, 20-21, and 43-45;
- h. Deposition of Amanda Hayes (8/25/14), pages 1, 39-40, and 48-49;
- i. Deposition of Linda Pinkney (9/16/14), pages 1, 13-14, 18-20, 25, 27-29, 31-33, 36-38, 40--44, and 49;
- j. Affidavit of Linda Pinkney, dated August 27, 2014;
- k. Affidavit of Shawn Bethea, dated September 2, 2014;
- l. Affidavit of Amanda Hayes, dated August 12, 2014;
- m. Affidavit of Tim Faulk, dated August 29, 2014;
- n. Affidavit of Elizabeth Kershner, dated April 8, 2014;
- o. Affidavit of Kathy Scott, dated April 10, 2014;
- p. Affidavit of Susan Horne, dated May 8, 2014;
- q. Affidavit of Todd Shifflet, dated April 14, 2014;
- r. Affidavit of David Watford, dated April 15, 2014;
- s. Affidavit of Thomas Graham, dated April 14, 2014; and
- t. Affidavit of Sean Boynes, DMD, dated April 21, 2014.

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

Respectfully submitted,

October 9, 2015

  
Andrea E. White (S.C. Bar # 1891)  
Laura Callaway Hart (S.C. Bar # 2766)  
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Attorneys for Respondent

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DILLON COUNTY  
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Antonia Graves.....Appellant,

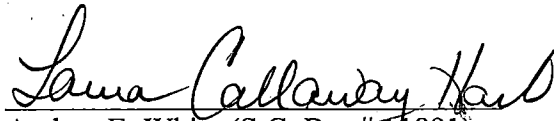
v.

Dillon County Board of Education, Dillon County School District Four,  
Richard Schafer, James McRae, Ray Rogers, Arthur McMillan,  
Amanda Hayes, and Clareth Whitfield.....Respondents

**CERTIFICATE OF COUNSEL**

I certify that the Designation of Matter to Be Included in the Record on Appeal of Respondents Dillon County Board of Education, Dillon County School District Four, Richard Schafer, James McRae, Ray Rogers, Arthur McMillan, Amanda Hayes, and Clareth Whitfield contains no matter which is irrelevant to the appeal.

October 9, 2015



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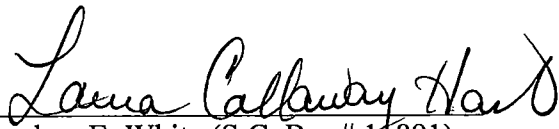
v.

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Richard Schafer, James McRae, Ray Rogers, Arthur McMillan,  
Amanda Hayes, and Claretha Whitfield.....Respondents

**PROOF OF SERVICE**

I certify that I have served Respondents' Designation of Matter to Be Included in the Record on Appeal on Appellant Antonia Graves, by depositing a copy in the United States Mail, postage prepaid, on October 9, 2015, addressed to P.O. Box 2104, Dillon, South Carolina 29536.

October 9, 2015

  
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Attorney for Respondents

(CONTINUED ON NEXT PAGE)

Other Party of Record:

Ms. Antonia Graves  
P.O. Box 2104  
Dillon, South Carolina 29536

Appellant

DUFF, WHITE & TURNER, L.L.C.

ATTORNEYS AND COUNSELORS AT LAW

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† CERTIFIED CIVIL ARBITRATOR AND MEDIATOR

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**SC Court of Appeals**

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Antonia Graves v. Dillon County Board of Education, Dillon County School District Four, Richard Schafer, James McRae, Ray Rogers, Arthur McMillan, Amanda Hayes, and Claretha Whitfield  
Appellate Case No. 2015-000163

Dear Ms. Kitchings:

I am enclosing for filing the Initial Brief and Proof of Service of Respondents Dillon County Board of Education, Dillon County School District Four, Richard Schafer, James McRae, Ray Rogers, Arthur McMillan, Amanda Hayes, and Claretha Whitfield ("Respondents") in the above-referenced appeal.

Also enclosed please find Respondents' Designation of Matter to Be Included in the Record on Appeal and Certificate of Counsel in the above-referenced case.

Thank you for your assistance in this matter.

Sincerely,



Laura Callaway Hart (S.C. Bar # 2766)  
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P. O. Box 1486  
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/jmg

c: Antonia Graves, Appellant  
Andrea E. White, Esq.