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January 6, 2016

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SC Court of Appeals

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1015 Sumter Street - 5th Floor  
Columbia, SC 29201

RE: Lake City College Preparatory Academy v. South Carolina Public Charter  
School District  
Civil Action No. 14-ALJ-30-0256  
Appellate Case No. 2014-002372  
Our File No. 41106/01503

Dear Ms. Kitchings:

On behalf of the Respondent South Carolina Public Charter School District ("District"), I am writing to ask the Court not to reinstate this matter because Appellant continues to fail to comply with Court rules, prejudicing the District in its ability to respond.

Specifically, the last versions of the Appellant's Final Brief and Appellant's Final Reply Brief that have been served on the District do not contain references to the Record. Instead, most, if not all, of the citations in the briefs only refer to "Rec \_\_\_\_." Appellant's initial briefs similarly refer only to "Rec \_\_\_\_." Appellant's reference to its briefing before the Administrative Law Court also lacks references to the Record, making his arguments regarding incorporation of these briefs meritless. *See* Rec. 2908 to 2965. Without citations to the Record, the District is left guessing as to what Appellant claims supports its arguments, which the District believes are without legal merit or factual support in the Record.

With regard to the needed redactions of student personal information, the District has not been served with a revised Record on Appeal as of today. However, as long as the Record on file with the Court has been corrected to remove the information protected by federal law to the Court's satisfaction, the District has no objection in this regard. The Court may recall that the

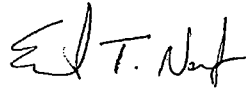
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District previously provided a version of the Record with the required redactions to Appellant's counsel for filing, but it appears Appellant declined to use that version.

This matter has been dismissed twice based on Appellant's failure to comply with this Court's most basic rules, timelines and Orders. Reliance on paralegal Benita Dinkins-Robinson, who was also a client of Appellant's counsel and herself a former charter school director now serving time for embezzlement of government funds, should not be accepted as an excuse for the non-compliance in this case, particularly where Ms. Dinkins-Robinson already had been convicted at the time of the initial non-compliance and Appellant still has not corrected the issues.

Thank you for your consideration of these matters. Please let us know if you require any further information.

Very truly yours,



Erik T. Norton

ETN:ls

cc: Johnny Watson, Esquire  
Mark W. Buyck, III, Esquire