

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Case No. 2014-CP-40-4666
Appellate Case No. 2016-001198

RECEIVED
OCT 12 2016
SC Court of Appeals

Kim Murphy.....Appellant,

v.

Richland-Lexington School District 5 Board of Trustees, Robert Gantt, and Robert Bowers, in
their individual capacities,.....Respondents.

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

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

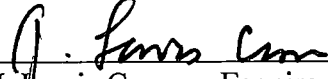
1. February 15, 2013 Hearing Transcript
2. March 19, 2013 Hearing Transcript
3. Appellant's Memorandum in Opposition to Appellees' Motion for Summary Judgment
4. Order Granting Appellees' Motion for Summary Judgment
5. Motion to Reconsider Judgment
6. Appellant's Answer to interrogatory Attachment
7. Complaint
8. Deposition of Kim Murphy (6/22/15; 7/22/15; 8/10/15; 11/5/15)

9. Deposition of Robert Gantt
10. Deposition of Gloria Wilson
11. Deposition of Bobby Bowers
12. Deposition of William Roberts
13. Deposition of Alan Jon Zupan
14. Deposition of John Cloyd
15. Exhibit 2 from the Deposition of Robert Gantt
16. Exhibit 10 to 2/15/13 Hearing: Map
17. Board Meeting Resolutions (9/12/11)
18. Letter from Kim Murphy to Robert Gantt (December 2010)
19. Community Complaints to the Board (June 2011)
20. Community Complaints to the Board (November 2011)
21. Beth Watson's Attachment to March 2011 Board Meeting
22. Ed White's Attachment to March 2011 Board Meeting
23. Beth Watson and Ellen Baumgardner's Attachment to February 2012 Board Meeting
24. September 2011 Board Meeting Minutes and Attachments
25. Students' Statements During Board Meeting
26. District Website
27. District Website Posting
28. February 2011 Board Meeting Minutes
29. Email to Bobby Bowers Regarding Draft Request Letter
30. John Cloyd's Email Discussing Boundary Dispute
31. Response Letter from Bobby Bowers (January 2013)

32. Maps of Kim Murphy's Property
33. First Supplemental Report of Ronnie Tyler
34. Affidavit of Ronnie Tyler
35. Email Cancelling Photographer
36. Robert Gantt's Public Statement (January 14, 2013)
37. Kim Murphy's Email to Public About Residence
38. Robert Gantt's Public Statement (January 28, 2013)
39. Robert Gantt's Letter to Judge Cooper
40. Alan Jon Zupan's Email to Jack Maguire (January 2013)
41. Procurement Violation Email
42. William Roberts's Email to Jack Maguire (February 2013)
43. William Robert's Email to Dean Crepes (January 2013)
44. March 19, 2013 Board Meeting Minutes
45. Robert Gantt's Public Statement (March 19, 2013)
46. 2014 Bill: Geodetic Survey

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

J. LEWIS CROMER & ASSOCIATES, LLC



J. Lewis Cromer, Esquire (#1470)
1418 Laurel Street
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
Fax 803-799-9533
Attorneys for Appellant

Columbia, South Carolina
October 12, 2016

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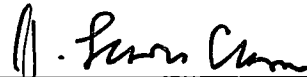
v.

Richland-Lexington School District 5 Board of Trustees, Robert Gantt, and Robert Bowers, in
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CERTIFICATE OF COUNSEL

I hereby certify, as counsel of record in the above-captioned case, that the Designation
submitted herewith contains no matter which is irrelevant to the appeal as required by Rule
209(c), SCACR.

J. LEWIS CROMER & ASSOCIATES, LLC



J. Lewis Cromer, Esquire (#1470)

1418 Laurel Street

Post Office Box 11675

Columbia, South Carolina 29211

Phone 803-799-9530

Fax 803-799-9533

Attorneys for Appellant

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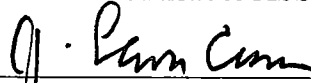
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PROOF OF SERVICE

I certify that I, the undersigned employee of J. Lewis Cromer & Associates, L.L.C., caused to have served Appellant's Initial Brief and Appellant's Designation of Matter to be Included in the Record on Appeal on Counsel for Respondent by depositing a copy of it in the United States Mail, postage prepaid, on October 12, 2016, addressed to Patrick J. Frawley, Esq., DAVIS FRAWLEY, LLC, P.O. Box 489, Lexington, SC 29071-0489; David L. Morrison, Esq., MORRISON LAW FIRM, LLC, 7453 Irmo Drive, Suite B, Columbia, SC 29212; and Michael H. Montgomery, Esq., MONTGOMERY WILLARD, LLC, P.O. Box 1186, Columbia, SC 29211.

(SIGNATURE FOLLOWS ON NEXT PAGE)

J. LEWIS CROMER & ASSOCIATES, LLC



J. Lewis Cromer, Esquire (#1470)

1418 Laurel Street

Post Office Box 11675

Columbia, South Carolina 29211

Phone 803-799-9530

Fax 803-799-9533

Attorneys for Appellant

Columbia, South Carolina

October 12, 2016

**J. LEWIS CROMER
& ASSOCIATES L.L.C.**

ATTORNEYS AND COUNSELORS AT LAW

J. Lewis Cromer
Julius W. Babb, IV · J. Paul Porter
Ryan K. Hicks · Shannon M. Polvi

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SC Court of Appeals

Via Hand Delivery

Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Kim Murphy v. Richland-Lexington School District 5 Board of Trustees, et al.*
Appellate Case No.: 2016-001198

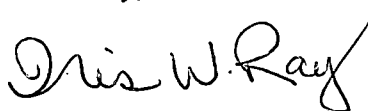
Dear Ms. Kitchings:

Enclosed please find the original and two (2) copies of the Initial Brief of Appellant, as well as Appellant's Designation of Matter on the above referenced matter. Also, enclosed are the original and one (1) copy of the Proof of Service. Please file the originals and return the clocked copies to our courier. By copy of this letter, I am serving counsel of record with a copy of same.

Should you have any questions and/or concerns, please feel free to call us. Thank you in advance for your assistance in this matter.

With kind regards, I remain

Sincerely,



Iris W. Ray
Litigation Paralegal

/iwr
Enclosures

cc: Patrick J. Frawley, Esq.
David L. Morrison, Esq.
Michael H. Montgomery, Esq.
Kim Murphy