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SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court Of Appeals**

**APPEAL FROM RICHLAND COUNTY
Court of Common Pleas**

The Honorable Letitia H. Verdin, Circuit Court Judge

C.A. No.: 2016-001058

Justin T., a minor, by and through his parent,
Caren D. TaylorAppellant(s)

v.

Richland County School District One,
and Percy Mack..... Respondent(s)

RESPONDENTS' MOTION TO SUPPLEMENT THE RECORD ON APPEAL

Pursuant to SCACR 212(b), Respondents move to supplement the Record on
Appeal with:

- (1) Defendants' Memorandum of Law in Support of its Motion to Dismiss;
- (2) Letters from the District's Hearing Officer to the Appellant's mother discussing Appellant's placement at Richland One Evening High School in lieu of expulsion;
- (3) The District's Student Code of Conduct Policy on Level II offense: I-Sexual Misconduct; and
- (4) The Forest Acres Incident Report regarding charges filed against

Appellant as a result of the incident giving rise to Appellant's transfer to Richland One Evening High School.

Respondents move without the consent of Caren Taylor, who is proceeding *pro se* on behalf of Justin T., to supplement the Record on Appeal because she contends that the above-referenced documents should be excluded because they were not in the Record on Appeal to the Circuit Court. However, all of the documents Respondents move to include in the Record on Appeal to this Court were discussed either in Defendants' Memorandum of Law in Support of its Motion to Dismiss,¹ Appellant's Notice of Appeal, or Amended Notice of Appeal, and as such, are matters that were presented to the Circuit Court and are relevant to this Appeal.

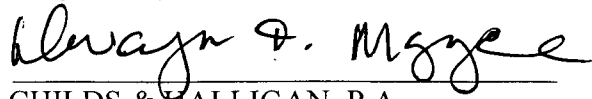
Currently, final briefs are due to be filed by November 14, 2016, but subject to the Court's approval, the parties will hold those final briefs in abeyance until the Court rules on this motion, so that both parties will know if they should refer to page numbers in the current Record and the Appendix to the Record on Appeal.

WHEREFORE, Respondents respectfully request that the court permit it to supplement the Record on Appeal by filing an Appendix to the Record on Appeal.

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¹ Defendants' Memorandum of Law in Support of its Motion to Dismiss was provided to Appellant's former counsel and to the Circuit Court Judge immediately prior to the Motion to Dismiss hearing on April 15, 2016. This brief was inadvertently not included in Respondents' Designation of Matter to be included on the Record on Appeal.

Respectfully submitted,



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