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IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Jean H. Toal, Circuit Court Judge

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DEC 19 2016

Consolidated Civil Action No.: 2015-CP-10-2389

SC Court of Appeals

Amy Garrard and Lee Garrard, Guardians Ad Litem for R.C.G.,  
A Minor; and Dean Frailey and Kathryn Frailey, Guardians Ad Litem for C.F.,  
A Minor, Richard Nelson and Cheryl Nelson, Guardians Ad Litem for D.G.N.,  
A Minor; Adam Olsen Ackerman; and A.E.P., III, .....Appellants,

-v-

Charleston County School District, Kevin Clayton,  
Axxis Consulting Company, and Jones Street  
Publishers, LLC, Defendants,

Of whom, Jones Street Publishers, LLC is .....Respondent.

NOTICE OF APPEAL

PLEASE take notice that Amy Garrard and Lee Garrard, Guardians Ad Litem for R.C.G.,  
A Minor; and Dean Frailey and Kathryn Frailey, Guardians Ad Litem for C.F., A Minor, Richard  
Nelson and Cheryl Nelson, Guardians Ad Litem for D.G.N., A Minor; Adam Olsen Ackerman;  
and A.E.P., III (“Appellants”), pursuant to Rule 203, SCACR, appeals the Order of the  
Honorable Jean H. Toal signed November 15, 2016 and filed November 18, 2016, granting  
Defendant Jones Street Publishers, LLC’s Motion for Summary Judgment. (Exhibit A).

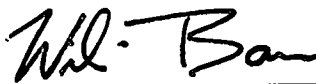
Appellants file this Notice of Appeal under the consolidated case number used by the lower court in the Order on appeal. The underlying cases – *Amy Garrard and Lee Garrard, Guardians Ad Litem for R.C.G., A Minor, and Dean Frailey and Kathryn Frailey, Guardians Ad Litem for C.F., A Minor v. Charleston County School District, et al., Civil Case No. 2014-CP-10-7203; Richard Nelson and Cheryl Nelson, Guardians Ad Litem for D.G.N., A Minor v. Charleston County School District, et al., Civil Case No.: 2015-CP-10-605; Adam Olsen Ackerman v. Charleston County School District, et al., Civil Case No.: 2015-CP-10-1044; and A.E.P., III v. Charleston County School District, et al., Civil Case No.: 2015-CP-10-2389* – were consolidated in the lower court by an Order signed October 23, 2015. Appellants appeal all of the referenced cases under the consolidated case number 2015-CP-10-2389.

Appellant received written notice of entry of the Order granting Defendant Jones Street Publishers, LLC's Motion for Summary Judgment on November 21, 2016. This Notice is timely filed. A copy of the Order appealed is attached to this Notice.

Respectfully submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

December 16, 2016  
Hampton, South Carolina

BY:   
\_\_\_\_\_  
John E. Parker  
William F. Barnes, III  
101 Mulberry Street, East  
P.O. Box 457  
Hampton, SC 29924  
Phone: (803) 943-2111  
Email: jparker@pmped.com  
Email: wbarnes@pmped.com

*Attorneys for Appellants*

Other Counsel of Record:

Wallace K. Lightsey, Esquire  
Meliah Bowers Jefferson, Esquire  
WYCHE, P.A.  
44 E. Camperdown Way  
Greenville, SC 29601-3591  
Phone: (864) 242-8200  
Email: [wlightsey@wyche.com](mailto:wlightsey@wyche.com)  
Email: [mjefferson@wyche.com](mailto:mjefferson@wyche.com)

*Attorneys for Respondent*

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Jean H. Toal, Circuit Court Judge

Consolidated Civil Action No.: 2015-CP-10-2389

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A Minor, Richard Nelson and Cheryl Nelson, Guardians Ad Litem for D.G.N.,  
A Minor; Adam Olsen Ackerman; and A.E.P., III, .....Appellants,

-v-

Charleston County School District, Kevin Clayton,  
Axxis Consulting Company, and Jones Street  
Publishers, LLC, Defendants,

Of whom, Jones Street Publishers, LLC is .....Respondent

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing Notice of Appeal and Motion to Consolidate has been served upon the following counsel of record by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below this 16 day of December, 2016.


William H. Davidson, II, Esquire  
Davidson & Lindemann, PA  
Post Office Box 8568  
Columbia, SC 29202-8568

Wallace K. Lightsey, Esquire  
Meliah Bowers Jefferson, Esquire  
WYCHE, P.A.  
44 E. Camperdown Way  
Greenville, SC 29601

Mr. Kevin L. Clayton  
Axxis Consulting Company  
1680 Dew Pl. 2203  
Marietta, GA 30064-5336

PETERS, MURDAUGH, PARKER, ELTZROTH  
& DETRICK, P.A.

December 16, 2016  
Hampton, South Carolina

BY:   
John E. Parker  
William F. Barnes, III  
101 Mulberry Street, East  
P.O. Box 457  
Hampton, SC 29924  
Phone: (803) 943-2111  
Email: jparker@pmped.com  
Email: wbarnes@pmped.com

*Attorneys for Appellants*

LAW OFFICES  
**PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK**

JOHN E. PARKER  
\* CLYDE A. ELTZROTH, JR.  
DANIEL E. HENDERSON  
MARK D. BALL  
RANDOLPH MURDAUGH, IV  
RONNIE L. CROSBY  
R. ALEXANDER MURDAUGH  
BERT G. UTSEY, III  
RANDOLPH MURDAUGH, III  
GRAHAME E. HOLMES  
LEE D. COPE  
MATTHEW V. CREECH  
LEAGUE B. CREECH  
STEVEN D. MURDAUGH  
WILLIAM F. BARNES, III  
AUSTIN H. CROSBY  
NEIL E. ALGER

\* INACTIVE

PROFESSIONAL ASSOCIATION  
101 MULBERRY STREET EAST  
P.O. BOX 457  
HAMPTON, SOUTH CAROLINA  
29924-0457

December 16, 2016

RANDOLPH MURDAUGH, SR.  
(1887-1940)  
RANDOLPH MURDAUGH, JR.  
(1915-1998)  
J. ROBERT PETERS, JR.  
(1927-2008)  
J. PAUL DETRICK  
(1948-2016)

TELEPHONE  
(803) 943-2111  
TOLL FREE  
(866) 943-2113  
FACSIMILE  
(803) 943-3943  
(803) 914-2014  
WEBSITE

[www.pmped.com](http://www.pmped.com)

William F. Barnes, III

Direct Dial: (803) 914-6702

Email: [wbarnes@pmped.com](mailto:wbarnes@pmped.com)

Paralegal: [mdavis@pmped.com](mailto:mdavis@pmped.com)

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DEC 19 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629

**Re:** *Amy Garrard and Lee Garrard, Guardians Ad Litem for R.C.G., A Minor; and Dean Frailey and Kathryn Frailey, Guardians Ad Litem for C.F., A Minor, Richard Nelson and Cheryl Nelson, Guardians Ad Litem for D.G.N., A Minor; Adam Olsen Ackerman; and A.E.P., III v. Jones Street Publishers, LLC, et al.*  
*Civil Action No.: 2015-CP-10-2389 (Consolidated Case)*

*-And-*

*Eugene H. Walpole v. Jones Street Publishers, LLC, et al.*  
*Civil Action No.: 2014-CP-10-7655*

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the Notice of Appeal in the above-referenced case, proof of service of the Notice of Appeal on Respondent, Jones Street Publishers, LLC, copy of the Order challenged on appeal, and check in the amount of \$100.00 for the filing fee. Also enclosed is a Motion to Consolidate this appeal with an appeal simultaneously filed for *Eugene H. Walpole v. Jones Street Publishers, LLC*, Civil Action No. 2014-CP-10-7655, and check in the amount of \$25.00 for the filing fee. Please file the documents and return a file-stamped copy to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions, please do not hesitate to contact our office.

With kind regards, I am

Sincerely,



William F. Barnes, III

*Peters, Murdaugh, Parker,  
Eltzroth & Detrick, P.A.  
December 16, 2016  
Page 2*

WFB/mcd  
Enclosures as stated

cc: The Honorable Julie J. Armstrong  
William H. Davidson, II, Esquire  
Wallace K. Lightsey, Esquire  
Meliah Bowers Jefferson, Esquire  
Mr. Kevin L. Clayton

**PRIORITY**  
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SC Court of Appeals

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PETERS | MURDAUGH | PARKER | ELTZROTH | DETRICK  
101 Mulberry Street East  
Post Office Box 457  
Hampton, South Carolina 29924

TO:

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211-1629