

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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AUG 16 2017

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas

SC Court of Appeals

The Honorable Perry H. Gravely, Circuit Court Judge

Case No. 2016-CP-23-02113

Appellate Case No. 2017-001147

Aminah A. Richburg,.....Appellant,

v.

E.A. "Rico" Williams, Director, District One S.C. Basketball Officials Association
and the South Carolina High School League,..... Respondents.

**RESPONDENTS' RESPONSE TO APPELLANT'S REPLY AND APPEAL TO DISMISS
RESPONDENTS' MOTION TO DISMISS AND RESPONDENTS' REPLY**

Pursuant to Rule 240(e), SCACR, Respondents, E.A. "Rico" Williams, Director, District One, S.C. Basketball Officials Association, and the South Carolina High School League, jointly submit the following return to Appellant's "Reply and Appeal" to "Dismiss Respondents' Joint Motion to Dismiss" and Appellant's "Reply and Appeal to Dismiss Respondents' Joint Reply to Appellant's Return." To the extent the Court deems this a separate motion filed by Appellant, as parties are not permitted to file a "reply to the reply" under the South Carolina Appellate Court Rules,¹ Respondents oppose the relief sought and would rely upon all arguments raised in their previous filings and incorporate them by reference as if set forth herein verbatim. For all of those

¹ Rule 240, SCACR, only provides for a motion, a return, and a reply. See Rule 240(d)-(f), SCACR. Our appellate court rules do not permit Appellant to continue submitting successive filings on the same subject just so she receives the last word.

reasons, the Court should deny the relief sought by Appellant and grant Respondents' Motion to Dismiss the appeal in this matter for failure to timely serve the Notice of Appeal.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

By: Sarah Hurley by VC1 with express permission
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Greenville, South Carolina
August 16, 2017

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Attorneys for Defendant, South Carolina High School
League

Columbia, South Carolina
August 16, 2017

THE STATE OF SOUTH CAROLINA
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SC Court of Appeals

Aminah A. Richburg Appellant,

v.

E.A. "Rico" Williams, Director, District One S.C. Basketball Officials
Associations and the South Carolina High School League. Respondents.

CERTIFICATE OF SERVICE

I, the undersigned legal assistant of the law offices of Sowell Gray Robinson Stepp & Laffitte, L.L.C., attorneys for Defendant, South Carolina High School League, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Respondents' Response to Appellant's Reply and Appeal to Dismiss
Respondents' Motion to Dismiss and Respondents' Reply

Counsel Served:

Ms. Aminah A. Richburg
217 Plum Creek Lane
Greenville, South Carolina 29607

Sarah Day Hurley, Esquire
Turner Padgett Graham & Laney, P.A.
Post Office Box 1509
Greenville, South Carolina 29602

A handwritten signature in black ink that reads "Robin C. Owens". The signature is written in a cursive style with a large, looped "O" at the end.

Robin C. Owens
Legal Assistant

Columbia, South Carolina

August 16, 2017.



**SOWELL GRAY
ROBINSON**

Litigation + Business

MICHAEL MONTGOMERY

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August 16, 2017

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AUG 16 2017

SC Court of Appeals

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

RE: Aminah A. Richburg v. E.A. "Rico" Williams, Director, District One S.C. Basketball Officials Association, and the South Carolina High School League
Civil Action No.: 2016-CP-23-02113
Appellate Case No.: 2017-001147
Date of Loss: 2/2/16
IRF Claim No.: 74430
Our File No.: 5346/1536

Dear Ms. Kitchings:

Enclosed herewith for filing please find the original and seven (7) copies of the Respondents' Response to Appellant's Reply and Appeal to Dismiss Respondents' Motion to Dismiss and Respondents' Reply in the above-referenced matter. We would ask that you file the original and return a clocked-in copy of same to us.

By copy of this letter to Ms. Aminah A. Richburg and Sarah Day Hurley, Esquire, we are herewith serving a copy of same upon each of them.

With warmest regards, I remain

Very truly yours,

J. Michael Montgomery

JMM:rco

Enclosures

cc: Ms. Aminah A. Richburg
Sarah Day Hurley, Esquire