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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appeal From Cherokee County  
Court of Common Pleas

J. Mark Hayes Jr., Circuit Court Judge

Docket No.: 2015-CP-11-0828

Appellate Case No. 2017-001466

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MAR 30 2018  
SC Court of Appeals

Sharon Brown, . . . . . Appellant,

vs.

Cherokee County  
School District, . . . . . Respondent.

APPELLANT'S MOTION TO AMEND FINAL BRIEF(S)

The appellant requests that this Court allow her to file AMENDED FINAL BRIEF(S) in the above captioned case. The appellant is appealing her teacher termination from the respondent school district. Prior to appearing before this Court, appellant filed a teacher appeal with Cherokee County Court of Common Pleas. Therefore, a transcript of the teacher dismissal hearing should have been made a part of the record by the respondent district at the lower court.

On October 30, 2017 the appellant inquired into why the *Transcript of the Teacher Dismissal Hearing* was not showing up online on Cherokee County Court of Common Pleas'

website and was told by Ms. Brittany Ramsey , Clerk for Cherokee County Common Pleas, that no transcript was ever filed by the Respondent school district in the above case.

The appellant was not aware of the fact that no transcript was filed by the Cherokee County School District Board of Trustees as mandated by *S.C. Teacher Employment and Dismissal Act*, section 59-25-480, until this case was before this court.

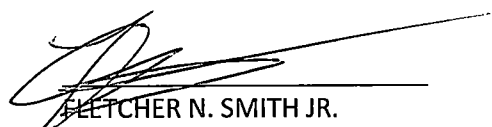
In a document dated December 20, 2017 submitted to this court, Respondent District's attorneys stated the following: "Notwithstanding that the Cherokee County Clerk of Court's records do not reflect that the Transcript was received in that office." It is to be noted that respondent district's attorneys claim that the transcript of the teacher dismissal hearing was mailed to the Cherokee County Court of Common Pleas Clerk of Court office on December 1, 2015.

Further, as a result of the newly acquired information concerning the teacher dismissal hearing transcript never having been filed at the Clerk of Court's Office at the Cherokee County Court of Common Pleas, which was discovered during the pendency of the appeal before this court, the appellant requests that she be allowed to submit AMENDED FINAL BRIEF(S) to fully preserve all issues for appellant surrounding this matter, to fully protect appellant's rights to a full and fair hearing on all issues in her case by this Court, and to allow her counsel to effectively represent her at this stage of the proceedings.

Further, Appellant asserts that she was not employed by contract with Cherokee County School District on June 5, 2015 and that she had already fulfilled her 190 day teaching contract for the 2014-2015 school term with Cherokee County School District prior to seeing Tracie Wilson (respondent's alleged witness) at Ross Department Store in Spartanburg, S.C. on June 5,

2015. The 2014-2015 school term had ended for Cherokee County School teachers prior to June 5, 2015. Therefore, Ms. Tracie Wilson's testimony (including all the lies and fabrications) should not have been entertained by Cherokee County School Board or be considered by any Court of this state. Appellant was not an employee of Cherokee County School District on June 5, 2015.

For these reasons, appellant through counsel, respectfully requests permission to file AMENDED FINAL BRIEF(S).



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**ATTORNEY FOR APPELLANT**

March 28, 2018

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**CERTIFICATE OF SERVICE**

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I, Sharon Brown, hereby certify that I have this 28<sup>th</sup> day March 2018, served a copy of the herein below listed document to the address listed below by depositing a copy of same in the United States Postal System postage prepaid, and mailing same to:

PLEADING(S): Appellant's Motion to Amend Final Brief(s)

**PARTY SERVED:**

Ms. Andrea E. White, Esq.  
Ms. Brittany M. Lozanne, Esq.  
White & Story, LLC  
P.O. Box 7036  
Columbia, S.C. 29202

  
SHARON BROWN  
Appellant

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FLETCHER N. SMITH, LLC  
ATTORNEY AT LAW



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March 28, 2018

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South Carolina Court of Appeals  
ATTN: Jenny Abbott Kitchings, Clerk of Court  
P.O. Box 11629  
Columbia, S.C. 29211

Re: Sharon A. Brown, Appellant vs. Cherokee County School District, Respondent.  
Docket No. 2015-CP-11-0828  
Appellate Case No. 2017-001466

Dear Clerk of Court,

Enclosed you will find one (1) original and six( 6) copies of *Appellant's Motion to Amend Final Brief(s)*. Additionally, you will find a Certificate of Service and a check for \$25 for the cost of the motion.

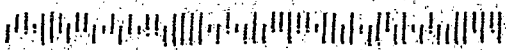
Please file, time stamp, and return copies of same in the self-addressed stamped envelope provided.

Sincerely,

  
Fletcher N. Smith Jr., Esquire

Enclosure(s)

Cc: Ms. Andrea E. White, Esquire  
Brittany M. Lozanne, Esquire  
White & Story, LLC



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