

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Case No. 2016-CP-23-02113

Appellate Case No. 2017-001147

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APR 27 2018
SC Court of Appeals

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' REPLY TO APPELLANT'S RESPONSE TO JOINT MOTION TO
STRIKE APPELLANT'S AMENDED DESIGNATION OF MATTER**

Pursuant to Rule 240(f) and Rule 210, SCACR, Respondents submit this reply to Appellant's response opposing their joint motion seeking an order striking various documents in the amended Designation of Matter to be included in the Record on Appeal. Because Appellant still has not provided copies of the documents referenced in Respondents' motion to strike to either Respondents or this Court, and failed to offer any justification for how documents dated months after the circuit court's order could have been submitted to the circuit court, the Court should strike numbers 105, 106, 107, 102, 112, 113, 123, 132, and 133 from Appellant's amended Designation of Matter. See Rule 209(b), SCACR (directing that "[a] party shall not include any matter in [her] designation which is not relevant to the appeal"); Rule 210(c), SCACR (asserting that "[t]he Record shall not . . . include matter which was not presented to the lower court").

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

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April 27, 2018

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April 27, 2018

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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 Appellant and 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' Reply to Appellant's Response to Respondents' Joint Motion to Strike Appellant's Amended Designation of Matter

Counsel Served:

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4/27

2018.



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Via Hand Delivery

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 SC Basketball Officials Associations, and the South
Carolina High School League
Appellate Case No. 2017-001147
Our File No. 5346/1536

Dear Ms. Kitchings:

Enclosed for filing are the original and seven copies of Respondents' Reply to Appellant's Response to Respondents' Joint Motion to Strike Appellant's Amended Designation of Matter with proof of service and filing fee in the above matter. Please return a filed copy to me via our courier.

By copy of this letter to *pro se* Appellant and counsel shown below, I am serving a copy of same upon them by mail. Thank you for your assistance.

Sincerely,

J. Michael Montgomery

JMM:rc
Enclosures

cc: Ms. Aminah A. Richburg
Sarah Day Hurley, Esquire
Vordman Carlisle Traywick, III, Esquire
Rebecca Laffitte, Esquire