RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

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SC Court of Appeals

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,

RECORD ON APPEAL (VOLUME ONE)

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Certificate of Counsel/ Appellate Pro Se

The undersigned hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

May 21, 2018

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Order of April 19, 2017

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STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	IN THE COURT OF COMMON PLEAS
Aminah A. Richburg, Plaintiff, vs. E.A. "Rico" Williams, Director, District One S.C. Basketball Officials Association, and the South Carolina High School League, Defendants.	Civil Action No. 2016-CP-23-02113 **ORDER GRANTING DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT AND DENYING PLAINTIFF'S MOTION TO COMPEL**

This matter came before the court on March 20, 2017, upon the following motions: (a) Plaintiff's Motion to Compel, (b) Defendant E.A. "Rico" Williams' Motion for Summary Judgment, and (c) Defendant South Carolina High School League's (SCHSL) Motion for Summary Judgment. After due deliberation, review of the memoranda and exhibits submitted, case law, affidavits, and arguments of the parties, the court grants the Defendants' Motions for Summary Judgment and denies the Plaintiff's Motion to Compel.

FACTS

Taken in the light most favorable to the plaintiff, the facts are as follows. The plaintiff filed this lawsuit on March 31, 2016, and her allegations arose out of a dispute between the plaintiff and the defendant, Rico Williams of the District One of the South Carolina Basketball Officials Association (SCBOA). In her Complaint, the plaintiff alleged a cause of action for defamation and asserted that Rico Williams created a "false narrative" about the plaintiff's performance as a basketball referee when he reported issues

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involving her to the District One Board of Directors. The communication at issue is an email Rico Williams sent on February 5, 2016 to the plaintiff, in response to a text message she had sent him. Members of the District One Board of Directors, along with Skip Lax, Commissioner of Officials for the SCHSL, also received a copy of this email. Ultimately, the District One Board of Directors voted on February 29, 2016, to inform the plaintiff that any future application to District One would not be accepted.

With respect to the SCHSL, plaintiff alleged that it improperly failed to investigate the reports by Rico Williams regarding the plaintiff and failed to intervene on her behalf when her membership was reviewed by the District One Board of Directors.

STANDARD OF REVIEW

The purpose of summary judgment is "to expedite disposition of cases which do not require the services of a factfinder." S. Glass & Plastics Co. v. Duke, 367 S.C. 421, 427, 626 S.E.2d 19, 22 (Ct. App. 2005) (quoting George v. Fabri, 345 S.C. 440, 452, 548 S.E.2d 868, 874 (2001)). Summary judgment is proper when there is no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law. Ellis v. Davidson, 358 S.C. 509, 517, 595 S.E.2d 817, 821 (Ct. App. 2004). All ambiguities, conclusions, and inferences arising from the evidence "must be construed most strongly against the moving party." Id. However, when plain, palpable, and indisputable facts exist on which reasonable minds cannot differ, summary judgment should be granted. Id. at 518, 595 S.E.2d at 822.

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ANALYSIS

I. **The SCHSL did not make any defamatory communications.**

Under South Carolina law, the elements of defamation include (1) a false and defamatory statement concerning another, (2) an unprivileged publication to a third party, (3) fault on the part of the publisher, and (4) either actionability of the statement irrespective of special harm or the existence of special harm caused by the publication. *See* Holtzscheiter v. Thomson Newspapers, Inc., 332 S.C. 502, 508, 506 S.E.2d 497, 501 (1998).

As previously stated, this case involves a dispute that arose between the plaintiff and Rico Williams, the District One Director of the SCBOA. The SCBOA, which operates under the SCHSL, is responsible for the training and development of basketball officials, along with the maintenance of a booking office for basketball contests between schools that are members of the SCHSL. The SCBOA has its own constitution and bylaws, and members of the SCBOA are divided into twelve regional districts. Each district has a director and a board of directors.

The SCHSL consists of approximately 400 high school and middle school members throughout South Carolina. Day-to-day operations of the SCHSL are conducted by the League's staff of approximately ten individuals, and the SCHSL has its own separate constitution and bylaws. Under the bylaws of the SCBOA, the Executive Committee of the SCHSL appoints a "Commissioner of Officials." For the relevant period, Skip Lax, Associate Commissioner of the SCHSL, was appointed to serve as the Commissioner of Officials for the SCBOA. The SCHSL works closely with the SCBOA with respect to

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training and certification of officials, keeping and maintaining records and ratings of officials, and assigns varsity contests through its software system, Arbiter.

The plaintiff joined District One of the SCBOA in 2013. As part of her membership, the plaintiff was required to sign a contract specific to District One. The contract included several provisions regarding professional standards for basketball officials, along with an acknowledgement that the District One director had the authority to enforce professional standards and to accept or reject the official's re-admittance to the SCBOA.

On or about February 2, 2016, the defendant, Rico Williams, received information from another official, John Williams, who officiated a middle school basketball game with the plaintiff on February 1, 2016. John Williams informed the defendant, Rico Williams, that the plaintiff wore "jogging/workout" pants during the basketball game. These kinds of pants are not approved attire for basketball officials, as the SCBOA bylaws require "straight leg black trousers without cuffs" that may be pleated or plain front. Rico Williams had previously spoken to the plaintiff the year prior about an incident in which she wore inappropriate pants to an assignment.

After Rico Williams left several messages for the plaintiff requesting contact, the plaintiff called Rico Williams on February 3, 2016. In that conversation, Rico Williams confirmed an upcoming assignment for the plaintiff at Furman University, and he informed her that it been reported to him that she was wearing jogging pants at the recent middle school basketball game. He asked Ms. Richburg if the report was true. Ms. Richburg replied that she does not wear jogging pants. Rico Williams then asked if it was problematic that he was asking that question, and the plaintiff repeated that she does not

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wear jogging pants and that she was at work. Rico Williams did not dispute the plaintiff's response and agreed to end the call, stating they would talk again soon.

A few minutes after their telephone conversation, the plaintiff sent the following text message to Rico Williams:

> Please discontinue the harassing communications. Previous District One leaders presented a higher level of professionalism which made officiating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL.

On February 5, 2016, Rico Williams emailed the plaintiff and copied in the District One Board of Directors and Skip Lax. After recapping the prior telephone conversation, Rico Williams quoted the text message sent by the plaintiff. Mr. Williams concluded the email with the following paragraphs:

> I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked off by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials or officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept. 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 1/2 meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

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> Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1 member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc. it is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route that you deem favorable.

The plaintiff alleges that this email (hereinafter referred to as the "February 5th email") created a "false narrative," which led to a vote by the Board of Directors not to accept any of her future applications into District One of the SCBOA.

It is undisputed that the recipients of the February 5th email were members of the District One Board of Directors and Skip Lax. Moreover, the plaintiff has produced no evidence that Commissioner Lax responded to the email from Rico Williams, nor is there any evidence that Commissioner Lax forwarded the email to anyone else. After the plaintiff received the February 5th email, she forwarded the email to Commissioner Lax along with a lengthy message. The plaintiff did not explicitly ask Commissioner Lax to intervene or to do anything in particular, and she expressed her displeasure with Rico Williams and his February 5th email. Additionally, she requested the names of the officials who "blocked" her, as referenced in the February 5th email. Commissioner Lax responded to the plaintiff's email by simply stating, "Aminah, we do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level."

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Based on the foregoing, summary judgment is appropriate for the SCHSL on the basis that Commissioner Lax did not make or publish any defamatory statements to a third-party. *See* Holtzscheiter, 332 S.C. at 508, 506 S.E.2d at 501.

The plaintiff has also complained about communications she had with an individual named Joedy Moots. Mr. Moots was the principal at Gray Collegiate Academy in West Columbia, South Carolina, and he also served as the Officials' Representative on the Executive Committee of the SCHSL in 2015-2016. The Executive Committee is the governing body of the SCHSL, and it is comprised of 16 representatives from various schools and organizations, including the South Carolina Officials' Association.

On February 16, 2016, the plaintiff forwarded Rico Williams' February 5th email to Mr. Moots and stated, "You are listed as the Officials Representative please advise on this matter." Following the plaintiff's initiation of communication with Mr. Moots, several more emails were exchanged between Mr. Moots and the plaintiff. It appears that Mr. Moots also forwarded his initial email response from February 22, 2016, to Rico Williams.

To the extent that plaintiff argues that Mr. Moots committed actionable defamation by forwarding his February 22nd email response to Rico Williams, this argument fails as a matter of law. First, Mr. Moots was not acting on behalf of the Executive Committee or the SCHSL. Instead, he was acting as a representative of the South Carolina Officials' Association *in response to* the plaintiff seeking him out for advice. Secondly, the emails from Mr. Moots are not defamatory toward the plaintiff. While the plaintiff did not like the response she received from Mr. Moots, the substance of Mr. Moots' email did not defame her in any way. *See* Erickson v. Jones Street Publishers, L.L.C., 368 S.C. 444, 471, 629 S.E.2d 653, 658 (2006) (stating that "[t]he law of defamation does not prevent a person

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from expressing and publishing truthful or non-defamatory statements- including pointed criticisms- of a guardian's actions in a particular case, regardless of whether the guardian is designated a public official, public figure, or private figure").

Accordingly, the plaintiff has not presented any evidence of defamatory statements made by the SCHSL and, therefore, summary judgment is appropriate.

II. Mr. Williams' statements were true.

Both defendants have asserted the absolute defense of truth in this case. South Carolina courts have held that truth of the matter is a complete defense to an action based on defamation. *See* Ross v. Columbia Newspapers, Inc., 266 S.C. 75, 80, 221 S.E.2d 770, 772 (1976). In fact, the defense of truth is sufficient where the evidence establishes that the statement was *substantially* true. Id. (citing Dauterman v. State-Record Co., 249 S.C. 512, 514, 154 S.E.2d 919, 919 (1967)) (emphasis added).

The following factual statements were included in Rico Williams' February 5th email that are allegedly defamatory: (1) Ms. Richburg was marked off/blocked by two schools and ten officials; (2) all of the officials that had blocked the plaintiff were rated higher than the plaintiff; and (3) the plaintiff had technically not attended all of the required District One meetings. As shown below, all of these statements are true.

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A. Blocks by Schools and Officials

Both the SCHSL and Rico Williams provided a list of blocks against the plaintiff.[1] Rico Williams' list of blocks includes ten names, along with the dates each block was entered. Nine of the officials who blocked sub-varsity basketball assignments with the plaintiff entered their blocks in 2014 or 2015, and one official entered a block on January 20, 2016. Additionally, two schools were listed as blocked from assignments with the plaintiff on the SCHSL list. The schools' blocks were entered by a member of the SCHSL staff on November 6, 2013. Therefore, the SCHSL has provided evidence that the statement regarding blocks in the February 5th email was true.

At the hearing and in her court filings, the plaintiff's only rebuttal to this supporting documentation provided by the defendants has been to claim that the records have been falsified. However, the plaintiff has not provided any evidence that questions the authenticity of these documents.

B. Ratings of Officials Who Blocked Plaintiff

The SCHSL publishes ratings of basketball officials every year, and the formula for the rating is found in the SCBOA bylaws. The SCHSL has produced in this case the complete set of ratings for the years 2013-2016. For every official identified by Arbiter as having blocked the plaintiff at the sub-varsity basketball level, their respective ratings are higher than the plaintiff's rating. This fact was not disputed by the plaintiff.

[1] The SCHSL explained that the lists are not identical due to the fact that the SCHSL would have had access to officials' blocks against the plaintiff in all varsity sports, while local district officials would have access to officials' blocks against the plaintiff in sub-varsity sports.

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C. Plaintiff's Failure to Attend Meetings

In support of the statements in his February 5th email regarding plaintiff's meeting deficiencies, Rico Williams produced documents created by the Secretary/Treasurer of District One, Kevin Brown. This chart, as well as comments taken from Mr. Brown's attendance spreadsheet, verify the information in the February 5th email about the plaintiff's attendance at meetings, along with other officials who may have left early or arrived late. In addition, in the plaintiff's first email to Commissioner Skip Lax complaining about Rico Williams' February 5th email, the plaintiff acknowledged that she had not attended all of the required meetings. Thus, the defense of truth has been established.

In conclusion, the statements in Rico Williams' February 5th email have been shown to be true. At the hearing on this matter, the plaintiff could not identify any information in the February 5th email that was untrue, and her main complaint was with the way Rico Williams framed and represented the information to the recipients of the email. The fact that plaintiff simply rejects the evidence presented by the defendants is not sufficient grounds to defeat summary judgment. *See* Shupe v. Settle, 315 S.C. 510, 516–17, 445 S.E.2d 651, 655 (Ct. App. 1994) ("A conclusory statement as to the ultimate issue in a case is not sufficient to create a genuine issue of fact for purposes of resisting summary judgment."); Felty v. Graves-Humphreys Co., 818 F.2d 1126, 1128 (4th Cir. 1987) ("Unsupported speculation is not sufficient to defeat a summary judgment motion.").

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III. Mr. Williams' statements were protected by a qualified privilege.

Even if the defense of truth had not been established, the defendants are entitled to summary judgment based on the defense of qualified privilege.

In a defamation action, a defendant may assert the affirmative defense of qualified privilege. Murray v. Holnam, Inc., 344 S.C. 129, 139, 542 S.E.2d 743, 748 (Ct. App., 2001). "Where the occasion gives rise to a qualified privilege, there is a prima facie presumption to rebut the inference of malice, and the burden is on the plaintiff to show actual malice or that the scope of the privilege has been exceeded." Swinton Creek Nursery v. Edisto Farm Credit, ACA, 334 S.C. 469, 485, 514 S.E.2d 126, 134 (1999).

The threshold issue is whether a qualified privilege exists between the SCHSL and the SCBOA. In general, the question of whether an occasion gives rise to a qualified privilege is a matter of law for the court. Murray, 344 S.C. at 140, 542 S.E.2d at 749. "A communication made in good faith on any subject matter in which the person communicating has an interest or duty is qualifiedly privileged if made to a person with a corresponding interest or duty even though it contains matter which, without this privilege, would be actionable." Id. at 140-41, 542 S.E.2d at 749.

Clearly, there is a common interest for both the SCHSL and the SCBOA regarding the dispute that arose between the plaintiff and Rico Williams. The SCBOA operates to provide basketball officials for SCHSL contests, and Skip Lax serves as both the Associate Commissioner of the SCHSL and the Commissioner of Officials with outlined responsibilities under the SCBOA bylaws. As previously stated, before being allowed to officiate a basketball contest, the plaintiff had to sign a District One SCBOA Contract and

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an SCHSL code of ethics. Given the relationship between the two organizations and their overlapping responsibility with basketball officials, a qualified privilege existed between the SCHSL and the SCBOA with respect to this situation involving the plaintiff. Additionally, the plaintiff herself threatened to report these issues with Rico Williams to the SCHSL in her text message to him *before* the February 5th email.

An abuse of a qualified privilege occurs when (a) a statement is made in good faith that goes beyond the scope of what is reasonable under the duties and interests involved; or (b) a statement is made with actual malice. Fountain v. First Reliance Bank, 398 S.C. 434, 444, 730 S.E.2d 305, 310 (2012); Murray, 344 S.C. at 142, 542 S.E.2d at 749 (in defamation action, if defendant proves qualified privilege, plaintiff may not recover unless he overcomes privilege by proving actual malice). In the absence of a controversy as to the relevant facts, it is for the court to say whether the privilege has been abused or exceeded. Fountain, 398 S.C. at 444, 730 S.E.2d at 310.

In this case, the defendants have not abused their qualified privilege. First, Rico Williams did not exceed the scope of the privilege because he only sent a copy of the February 5th email to the Board of Directors and the Commissioner of Officials. Secondly, there is no evidence that Rico Williams acted with malice. To begin with, it should be noted that, under the District One SCBOA Contract, Rico Williams, as the Director, had the sole authority to reject any future renewal applications. However, as testified to by Williams in his affidavit, instead of unilaterally deciding the repercussions of the plaintiff's actions, he submitted the matter to the Board of Directors out of fairness to the plaintiff.

Furthermore, because the plaintiff accused Rico Williams of "harassing" her and stated her intention to report Williams' alleged "monopoly status" to the SCHSL in her

initial text message. Williams testified in his affidavit that he felt it necessary to provide the SCHSL and the District One Board of Directors with a summary of his prior communications with the plaintiff. Also, Williams testified that, in his experience, the District One Board of Directors would typically become involved in disciplinary issues. The evidence thus leads to only one conclusion, namely that Williams communicated this information in a proper manner and only to proper parties who had a legitimate interest in the subject matter of the communication.

Additionally, there was no history of animosity between Rico Williams and the plaintiff. Before February 2016, Rico Williams often communicated with the plaintiff about non-SCHSL officiating opportunities. Additionally, according to the plaintiff, Rico Williams previously asked her to participate on a committee for District One, which the plaintiff declined due to time constraints. The plaintiff further testified that she never had any problems with Rico Williams before February 2, 2016. Thus, the record shows that Rico Williams had no motive to act towards the plaintiff with malice of any kind.

Given that a qualified privilege exists with respect to the allegedly defamatory February 5th email, the plaintiff must come forward with some evidence that Rico Williams acted with actual malice in his communications. For the reasons set forth herein, there is no genuine issue of material fact as to whether Rico Williams acted in good faith, and the information discussed by him was not done with any malice. Therefore, summary judgment is appropriate on the basis of qualified privilege.

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IV. The SCHSL was not negligent by "failing to intervene."

At the hearing and in various court filings, the plaintiff has claimed that Commissioner Lax and the SCHSL were negligent in failing to properly investigate the actions of Rico Williams. To prevail under a theory of negligence, "the plaintiff must provide evidence of three essential elements: (1) a duty of care owed by the defendant to the plaintiff; (2) a breach of that duty by a negligent act or omission; and (3) damages proximately caused by a breach of duty." Vinson v. Hartley, 324 S.C. 389, 399, 477 S.E.2d 715, 720 (Ct. App. 1996).

None of these elements have been met in this case. First, the SCHSL owes no duty to a basketball official, who is an independent contractor, to intervene in a dispute at the district level. In other words, the District One SCBOA Contract sets forth certain expectations between the members of District One and the district's leadership, and the plaintiff can point to no evidence that required the SCHSL to unilaterally adjudicate the dispute.

Furthermore, Commissioner Lax did not "fail to intervene" in the strict sense of the term; rather, the plaintiff is upset that Commissioner Lax deferred the dispute to be addressed at the district level. The same is true with Mr. Moots. The plaintiff asked for Mr. Moots' advice, but she did not like the advice she received. This is certainly not grounds for a negligence claim. Moreover, it should be noted that the SCHSL is a governmental entity subject to the South Carolina Tort Claims Act.[2] As such, the SCHSL is entitled to discretionary immunity pursuant to South Carolina Code section 15-78-60(5).

[2] S.C. Code Ann. §§ 15-78-10 through-220.

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To the extent the plaintiff argues that the SCHSL's duty to intervene is based on some provision of the SCHSL or SCBOA's bylaws, the SCHSL is immune from liability under South Carolina Code section 15-78-60(4), which provides that an entity cannot be held liable for loss resulting from the "adoption, enforcement, or compliance with any law or failure to adopt or enforce any law, whether valid or invalid, including, but not limited to, any charter, provision, ordinance, resolution, rule, regulation, or written policies."

As to the second element of negligence, the plaintiff failed to prove that the SCHSL breached any duty to her by acting unreasonably in responding to the plaintiff's situation. Commissioner Lax did not make any decisions in favor of or against either the plaintiff or Rico Williams, and he simply assessed the dispute as a local matter. Commissioner Lax's conduct did not make it more or less likely that the District One Board of Directors would make the decision it ultimately reached on February 29, 2016. Accordingly, the plaintiff also cannot prove the third element of negligence.

For the reasons stated above, the plaintiff has not set forth any evidence sufficient to charge the SCHSL with negligence and, therefore, the SCHSL is entitled to judgment as a matter of law.

PLAINTIFF'S MOTION TO COMPEL

At the hearing held on March 20, 2017, the plaintiff claimed she was entitled to additional documents that had not been produced by the defendants. However, the plaintiff could not identify with any specificity the documents she maintains should be produced. The defendants, on the other hand, provided evidence that they had fully responded to plaintiff's discovery requests, and to the extent objections had been asserted, such objections were valid and reasonable under the circumstances. Therefore, the plaintiff has

not met her burden of proof with respect to her Motion to Compel. Additionally, and more importantly, the arguments made by plaintiff in her Motion to Compel, as well as any other motion she has filed with respect to discovery, are moot in light of the court's ruling on the defendant's Motion for Summary Judgment.

CONCLUSION

Based on the reasoning set forth herein, the court grants the defendants' Motions for Summary Judgment and denies the plaintiff's Motion to Compel.

IT IS SO ORDERED.

Honorable Perry H. Gravely
Presiding Judge

_____, South Carolina

April_____, 2017.

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Appellate Complaint

STATE OF SOUTH CAROLINA,)

COUNTY OF GREENVILLE)

Aminah A. Richburg)

Plaintiff(s).)

vs.)

E.A. "Rico" Williams)

South Carolina High School League)

Defendant(s).)

IN THE COURT OF COMMON PLEAS

CASE NO: 2016-CP-23-02113

COMPLAINT

Complaint

(Jury Trial Requested)

The Plaintiff complaining against the Defendants would respectfully show unto the Court and allege:

GENERAL ALLEGATIONS

1. Plaintiff Aminah A. Richburg, is a private individual, is a citizen and resident of Greenville County, South Carolina.
2. Defendant, E.A. "Rico" Williams on information and belief, is the Director, District One South Carolina Basketball Officials Association and is an affiliate of the South Carolina High School League is organized and existing under the laws of the State of South Carolina with the directors principal place of business in Greenville County, South Carolina.
3. Defendant, South Carolina High School League, on information and belief, is a corporation organized and existing under the laws of the State of South Carolina with its principal place of business in Richland County, South Carolina.
4. At all material times relevant to this proceeding, Aminah Richburg is a member of the District One Basketball Officials Association in Greenville County since 2013.
5. At all materials relevant to this proceeding, Aminah A. Richburg provided basketball officiating services through the Defendants since 2013.
6. The Plaintiff is informed and believes and thereon alleges that the Defendants are in the business of providing basketball officials for High School and Middle School Basketball games and are subject to the requirement of Federal and State Law.
7. The Plaintiff is informed and believes and thereon alleges that the Defendant E.A. "Rico" Williams is in the business of providing basketball officials for South Carolina High School League,Upstate churchs, Greenville County, City of Greenville, YMCA, Upward Center,etc., and is subject to the requirements of Federal and State Laws.
8. Plaintiff is ignorant of the true names of schools, individuals and capacities communicated by the Defendants.
9. Plaintiff will seek leave of the Court to amend this Complaint to identify said Defendant claims by persons and schools when or if their identities are ascertained.
10. Plaintiff is informed and believes that the Defendants were in some fashion or manner liable and legally responsible for the damages and injuries set forth herein.

11. In doing the things hereinafter alleged, the Defendants acted with the course and scope of the organization with the knowledge, consent and approval and their conduct was ratified. In particular, at all times material hereto, defendants, individually and through their officers, directors, members, authorized the wrongful conduct alleged in this complaint, ratified said wrongful conduct and/or were personally guilty of defamation, malice, negligence and/or recklessness.
12. Subject matter jurisdiction is therefore vested in this Court; this Court has jurisdiction over the parties and venue is proper in Greenville County.

FOR A FIRST CAUSE OF ACTION

(Defamation)

13. The Plaintiff incorporate herein the General Allegations set forth above.
14. Defendants published one or more oral and written false statements to third parties which were intended to impeach the Plaintiff's honesty, integrity, virtue or reputation.
15. The defamatory statements were including but not limited to the following:
    a. The Defendant Mr. E.A. "Rico" Williams knowingly created a false narrative with misguided factual information. "From our records you are marked off by two schools", communicated to Mr. Skip Lax, Mr. Joedy Moots, Mr. Jerome Singleton and other South Carolina High School League State Officials. The Plaintiff marked off two schools due to personal reasons at the beginning of the season due to her place of employment (Hillcrest Middle School) and her son and daughters enrollment at their school (Christ Episcopal Church School). The Defendant Mr. E.A. "Rico" Williams communication was purpose in distorting the character and professionalism of the Plaintiff and the Defendant must present the records to support his defamation of the Plaintiff. If there were truly two schools than the records would show more than two schools as the Defendant Mr. E.A. "Rico" Williams communicated.
    b. The Defendant Mr. E.A. "Rico" Williams fabricated ten officials that have marked the Plaintiff off as well as fabricating a scenario that the Plaintiff is difficult to work with assignments with fellow officials. There are no records to support allegations communications made by the defendant. There are no records of any marginality on the officiating performance of the Plaintiff when assigned any games. Ninety-five percent of all basketball assignments for the Plaintiff have taken place at Middle Schools, the J.V. games have taken place at private schools and those games are minimal. Every assignment the Plaintiff has shared with other officials there has never been a situation or an opportunity during a basketball game whereas the Plaintiff behaved in a manner in which there was a need for instruction, or constructive criticism. The Plaintiff is a member of an officiating team and when officiating basketball games and willfully shares information and receives and gives advice during all basketball game assignments with the officiating team. The statements made about the Plaintiff were false and the Defendants were aware of their falsity.
    c. The Defendant Mr. E.A. "Rico" Williams communicated that all state officials that officiate other sports would be required to attend four meetings. The Defendant Mr. E.A." Rico" Williams then proceeded to give a false arrival time for the Plaintiff for required South Carolina Basketball Officials District One meetings for the 2015-2016 year. The Defendant purposefully created and presented fabricated documentation of the Plaintiffs arrival times for required meetings to further blight the Plaintiff. Every basketball officials meetings for South Carolina Basketball Officials Association District One officials are credited for attendance at roll call or through a sign in sheet. The Defendant must present documentation for arrival times for all officials at all meetings for all officials for the past three years. The Plaintiff never received any communications that she did not fulfill the requirements for membership for South Carolina Basketball Officials Association District One and received assignments

for basketball games beginning December 2, 2015 at League Academy, December 3, 2015 at Mauldin Middle School, December 10, 2015 at Bryson Middle School, December 11, 2015 at Eastside High School, December 14, 2015 at Tanglewood Middle School, December 17 at Sevier Middle School, January 7, 2016 at Greer Middle School, January 8, 2016 at Southside Christian School, and ended on February 6, 2016, January 13,2016 at Sevier Middle School, 1/26/2016 at Welcome Baptist Church, 1/29/2016 at Dacusville Middle School, February 1, 2016 at Beck Academy and the final game on 2/6/2016 at Tanglewood Middle School whereas the Defendant contemplated removing the assignment but did not but made the malicious decision to remove all future basketball official assignments until the Plaintiff's status was reviewed by the South Carolina Basketball Officials Association District One Board of Directors. Again the Plaintiffs status was never an issue beginning December 2, 2015 until the Defendant Mr. E.A. "Rico" Williams suggested and communicated that it should be.

d. The Defendant Mr. E.A. "Rico" Williams created/concocted the false unjustified and unprofessional narratives to support his decision to terminate future basketball officiating assignments for the Plaintiff and present his false accusations before the South Carolina Basketball Officials Association to discontinue my membership with the District.

e. The Defendant Mr. E.A. "Rico" Williams false statements were in response to a text message sent by the Plaintiff to Mr. E.A. "Rico" Williams after a brief conversation. The Defendant Mr. E.A. Williams shared the communication with Defendant Skip Lax , Assistant Commissioner of the South Carolina High School League . The text that was sent and quoted by the Defendant Mr. E.A. "Rico" Williams; "Please discontinue the harassing communications. Previous District One Leaders presented a higher level of professionalism which made officiating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments, I will communicate my disdain to the SCHL. The Defendant Mr. E.A. "Rico" Williams maliciously concocted the narrative to blight the Plaintiff and attached the text message without revealing all factual background information to gain support for his position to the Defendants at the South Carolina High School League.

f. Defendant Mr. Skip Lax, Assistant Commissioner of the South Carolina High School League was negligent in his leadership to properly investigate the allegations made by the Defendant Mr. E.A. "Rico" Williams. The Defendant Mr. Skip Lax disregarded the pleas of the Plaintiff for assistance and only communicated that the South Carolina High School League do not share blocks by schools or peers and also stated that the Plaintiff concerns were a local matter to be handled at the district level. The Defendant Skip Lax response gave the Defendant E.A. "Rico" Williams his support and guidance to continue his unethical behavior towards the Plaintiff and thereby proceed with the termination of the Plaintiff's membership as a South Carolina District One Basketball official.

g. Defendant Mr. Joedy Moots, the Officials Association's Representative for the South Carolina High School League's Executive committee failed to properly investigate the pleas communicated by the Plaintiff as her representative. The Defendant Mr. Joedy Moots had an opportunity to communicate to the Defendant E.A. "Rico" Williams that there is no clear justification for his behavior and position towards the Plaintiff and failing to do so only enabled and justified the unethical behaviors and decisions of the Defendant and the eventual termination of the Plaintiff with the South Carolina Basketball Officials Association District One.

h. Defendant Mr. Jerome Singleton, Commissioner of the South Carolina High School League was negligent to properly investigate the actions and proceedings of the Defendant E.A. Rico Williams to determine if

the Plaintiff's termination of future membership of the South Carolina Basketball Officials Association District One was just.

i. The Defendant E.A. "Rico" Williams abused his leadership and power and manipulated the Defendants South Carolina High School League to support his position due to past and present relationships the Defendant has with Mr. Joedy Moots, Mr. Skip Lax and Mr. Jerome Singleton and used that support to blight the Plaintiff

j. Defendant E.A. "Rico" Williams manalovent behavior toward the Plaintiff manipulated the District One Board of Directors by sharing false communications between Mr. Joedy Moots and the Plaintiff and the Plaintiff's position with local and state leadership.

k. Defendant Mr. E.A. Williams did not properly arrange or communicate an opportunity for the Plaintiff to discuss with the Board of Directors of District One any grievances or concerns the Plaintiff may have.

l. The actions of all Defendants exposed the Plaintiff to public ridicule which caused her to be shunned and avoided. (Recent rejection to officiate with the YBOA organization).The serial defamation has caused the Plaintiff to sustain substantial injury to her professional reputation and her good will. As a direct and proximate result of the Defendant(s) recklessness, willfulness and wantonness, the Plaintiff has suffered damages from embarrassment; humiliation; mental suffering; lost earnings; loss of consortium; and cost of retaining an attorney to defend her from the false allegations made by the Defendant(s).

m. Due to the Defendant's defamation of the Plaintiff made with malice, recklessness and intentional disregard of the Plaintiff's rights, the Plaintiff is entitled to a judgement against the Defendant(s), jointly and severally for actual damages; punitive damages, special damages. The Defendants(s) communicated to the Plaintiff that if there is any intent of the Plaintiff to apply for future membership in District One, the Plaintiff's application will not be accepted.

WHEREFORE, the Plaintiff respectfully prays for the following relief, the future is calculated for the next twenty-five years according to the age of elder basketball officials compared to the Plaintiff. The Plaintiff's basketball official's assignment fee for games is averaged at three thousand dollars a year for the next twenty- five years. The Plaintiff's Basketball tournaments assignment fee at three hundred and fifty dollars per tournament for eleven tournaments a year for the next twenty- five years and relief for harassment and pain and suffering at one hundred thousand dollars must be considered and loss of fees due to the Defendants actions after February 6, 2016.

Respectfully Submitted

Aminah A. Richburg
217 Plum Creek Lane Greenville, SC 29607
864-419-6707

Greenville, South Carolina
March 31, 2016

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	)	IN THE COURT OF COMMON PLEAS
Aminah A. Richburg, Plaintiff, vs. E.A. "Rico" Williams, Director, District One S.C. Basketball Officials Association, and the South Carolina High School League, Defendants.	)	Civil Action No. 2016-CP-23-02113 ANSWER OF DEFENDANT, SOUTH CAROLINA HIGH SCHOOL LEAGUE

The defendant, South Carolina High School League, answering the Complaint of the plaintiff herein:

1. Except as herein specifically admitted, each and every allegation in the Complaint as relates to the defendant, South Carolina High School League, is hereby expressly denied.

GENERAL ALLEGATIONS

2. Answering Paragraph 1 of the Complaint, the defendant, South Carolina High School League, is without knowledge or information sufficient to form a belief as to the allegations contained therein concerning the citizenship and residency of the plaintiff and therefore, demands strict proof thereof.

3. Answering Paragraph 2 of the Complaint, the defendant, South Carolina High School League, upon information and belief, would only admit so much contained therein which states that the defendant, E.A. "Rico" Williams, is the director of

District One of the South Carolina Basketball Officials Association, but except as specifically admitted herein, each of the remaining allegations contained therein is hereby expressly denied.

4. Answering Paragraph 3 of the Complaint, the defendant, South Carolina High School League, would admit that it is a voluntary association of public and private schools, and as such, it is a governmental entity subject to the South Carolina Tort Claims Act. Further answering Paragraph 3, the defendant, South Carolina High School League, admits that its principal place of business is in Richland County, South Carolina, but except as specifically admitted herein, each of the remaining allegations contained therein is hereby expressly denied.

5. Admits, upon information and belief, the allegations contained in Paragraphs 4 and 5 of the Complaint.

6. Answering Paragraph 6 of the Complaint, the defendant, South Carolina High School League, would only admit so much contained therein which states that it is involved in scheduling basketball officials for varsity sport contests but denies that it is responsible for scheduling officials for junior varsity and middle school basketball contests and demands strict proof thereof. Except as specifically admitted herein, each of the remaining allegations contained therein is hereby expressly denied.

7. Answering Paragraph 7 of the Complaint, the defendant, South Carolina High School League, would only admit that the defendant, E.A. "Rico" Williams, is the Director for District One of the South Carolina Basketball Officials Association and is involved in scheduling officials for various basketball contests, but except as specifically

admitted herein, each of the remaining allegations contained therein is hereby expressly denied.

8. Answering Paragraphs 8 and 9 of the Complaint, the defendant, South Carolina High School League, would assert that no response is required given the allegations do not address this defendant. To the extent a response is required, except as specifically admitted herein, each of the remaining allegations contained therein is hereby expressly denied.

9. Denies the allegations contained in Paragraph 10 of the Complaint and demands strict proof thereof.

10. Denies the allegations contained in Paragraph 11 of the Complaint and demands strict proof thereof.

11. Admits, upon information and belief, the allegations contained in Paragraph 12 of the Complaint regarding jurisdiction and venue.

FOR A FIRST DEFENSE
TO A FIRST CAUSE OF ACTION
(Defamation)

12. Answering Paragraph 13 of the Complaint, the defendant, South Carolina High School League, would reaffirm and reallege each of its defenses above as fully and effectually as if set forth herein verbatim.

13. Denies the allegations contained in Paragraph 14 of the Complaint and demands strict proof thereof.

14. Answering Paragraph 15 of the Complaint and all relating subparagraphs, the defendant, South Carolina High School League would respond as follows:

a. The defendant, South Carolina High School League, would admit that Mr. Williams communicated to the Plaintiff that she was marked off by two schools but denies that this communication was false or defamatory and denies strict proof thereof.

b. The defendant, South Carolina High School League, would admit that Mr. Williams communicated to the Plaintiff that she had been marked off by ten officials but denies that this communication was false or defamatory and denies strict proof thereof.

c. The defendant, South Carolina High School League, would admit that Mr. Williams communicated to the Plaintiff regarding her absences from all or part of meetings but denies that this communication was false or defamatory and denies strict proof thereof.

d. The defendant, South Carolina High School League, would assert that no response is required given the allegations do not address this defendant. To the extent a response is required, the defendant, South Carolina High School League, denies the allegations in subparagraph "d" and demands strict proof thereof.

e. The defendant, South Carolina High School League, would assert that no response is required given the allegations do not address this defendant. To the extent a response is required, the defendant, South Carolina High School League, would admit that Mr. Lax, Assistant Commissioner of the South Carolina High School League, was copied on an email from Mr. Williams to the Plaintiff regarding the text message sent by the Plaintiff, but denies the allegations in subparagraph "e" regarding the false and defamatory nature of this communication and demands strict proof thereof.

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f. The defendant, South Carolina High School League, would admit that Mr. Lax communicated to the Plaintiff that the South Carolina High School League did not share "blocks" by schools or peers with officials and that Plaintiff's concerns needed to be handled at the district level but denies that this communication was defamatory, negligent, or otherwise legally actionable and demands strict proof thereof.

g. The defendant, South Carolina High School League, would assert that no response is required given the allegations do not address this defendant. To the extent a response is required, the defendant, South Carolina High School League, denies the allegations in subparagraph "g" and demands strict proof thereof.

h. Denies the allegations contained in subparagraph "h" of Paragraph 15 and demands strict proof thereof.

i. Denies the allegations contained in subparagraph "i" of Paragraph 15 and demands strict proof thereof.

j. The defendant, South Carolina High School League, would assert that no response is required given the allegations do not address this defendant. To the extent a response is required, the defendant, South Carolina High School League, denies the allegations in subparagraph "j" and demands strict proof thereof.

k. The defendant, South Carolina High School League, would assert that no response is required given the allegations do not address this defendant. To the extent a response is required, the defendant, South Carolina High School League, denies the allegations in subparagraph "k" and demands strict proof thereof.

l. Denies the allegations contained in subparagraph "l" of Paragraph 15 and demands strict proof thereof.

m. The defendant, South Carolina High School League, would admit that Mr. Williams communicated to the Plaintiff that her membership in District One would not be accepted in the future but denies that this communication was false or defamatory and denies strict proof thereof. All other allegations in subparagraph "m" are hereby expressly denied.

32. Except as specifically admitted herein, all allegations in Paragraph 15 of the Complaint and all relating subparagraphs are hereby expressly denied.

FOR A SECOND DEFENSE
(Failure to State a Claim)

33. The defendant, South Carolina High School League, would show that the allegations in plaintiffs' Complaint as to all causes of action fail to allege facts sufficient to constitute a cause of action against it, and, therefore, the Complaint should be dismissed pursuant to Rule 12(b)(6), SCRCP.

FOR A THIRD DEFENSE
(Lack of Proximate Cause)

34. The defendant, South Carolina High School League, would show that would show that none of its alleged acts proximately caused plaintiff's alleged injuries and damages, if any, the same of which is denied, and, therefore, the plaintiff cannot recover from this defendant.

FOR A FOURTH DEFENSE

35. The defendant, South Carolina High School League, would show that plaintiff's Complaint fails because any alleged communications made were in furtherance of a common interest and were subject to an absolute, qualified, and/or conditional privilege and that these defendants did not exceed the scope of that privilege.

FOR A FIFTH DEFENSE

36. The defendant, South Carolina High School League, would show that in all times they acted in good faith, and as a result, plaintiff's causes of action are barred.

FOR A SIXTH DEFENSE

37. The defendant, South Carolina High School League, would show that the allegations in support of plaintiff's causes of action are be barred by the complete defense of truth.

FOR A SEVENTH DEFENSE
(Failure to Exhaust Administrative Remedies)

38. The defendant, South Carolina High School League, would show that Plaintiff failed to exhaust her administrative remedies through the procedures provided by the South Carolina Basketball Officials Association, and therefore, her suit should be dismissed.

FOR AN EIGHTH DEFENSE
(Tort Claims Act)

39. The defendant, South Carolina High School League, would show that under South Carolina law, the South Carolina Tort Claims Act is the sole and exclusive remedy for any action brought against the government or its agencies and the defendant would, therefore, plead the South Carolina Code Section 15-78-10 et seq., and all of its provisions as if incorporated herein verbatim as a defense to this matter.

FOR A NINTH DEFENSE
(Limitation on Damages)

40. The defendant, South Carolina High School League, would plead South Carolina Code §15-78-120(a) of the South Carolina Tort Claims Act and its

limitations on damages as an affirmative defense to any verdict that may exceeded the statutory caps provided by the South Carolina Tort Claims Act.

FOR A TENTH DEFENSE
(Limitation on Punitive Damages)

41. The defendant, South Carolina High School League, would plead South Carolina Code §15-78-120(b) of the South Carolina Tort Claims Act and its prohibition against punitive or exemplary damages as an affirmative defense to the allegations set forth in the Complaint to the extent said allegations seek said damages against the Defendant.

FOR AN ELEVENTH DEFENSE

42. The defendant, South Carolina High School League, would plead South Carolina Code §15-78-200, which provides that "[n]otwithstanding any provision of law, this chapter, the 'South Carolina Tort Claims Act' is the exclusive and sole remedy for any tort committed by an employee of a governmental entity while acting within the scope of the employee's official duty. The provisions of this chapter establish limitations on and exemptions to the liability of the governmental entity and must be liberally construed in favor of limiting the liability of the governmental entity," as an affirmative defense.

FOR A TWELFTH DEFENSE

43. The defendant, South Carolina High School League, requests that in any finding of any liability in favor of the plaintiff, and the same of which is denied, an apportionment of fault be made among all parties by the Court or jury. This defendant further requests that judgment and declaration of indemnification and contribution against

all other parties or persons in accordance with the apportionment of fault, pursuant to the South Carolina Contribution Among Tortfeasors Act, S.C. Code Ann. § 15-38-10 *et. seq.*

FOR A THIRTEENTH DEFENSE

44. The defendant, South Carolina High School League, has not had an opportunity to conduct a sufficient investigation or to engage in adequate discovery touching on the circumstances in the plaintiff's Complaint. This defendant intends to act as best it can to inform itself as to the pertinent facts or prevailing circumstances surrounding any report or injury or damage to the plaintiffs as alleged in the Complaint, and gives notice of its intent to assert any affirmative defenses that its information-gathering process may indicate is supported by law and fact, including, but not limited to, a defensive action is barred in whole or in part by any applicable statute, contract, release, covenant, or the doctrine of laches. The defendant, South Carolina High School League, does reserve the right to amend this Answer to assert any such defenses.

FOR A FOURTEENTH DEFENSE

45. The defendant, South Carolina High School League, would plead lack of publication as a bar to plaintiff's claims against this defendant.

FOR A FIFTEENTH DEFENSE
(Unconstitutionality of Punitive Damages)

46. To the extent the plaintiffs may assert claims for punitive damages, which is denied, the defendant, South Carolina High School League, would show that an award of punitive damages under South Carolina law violates the Fifth, Sixth, and Fourteenth Amendments of the United States Constitution and Article I, Section 3 of the South Carolina Constitution in that:

a. The judiciary's ability to correct a punitive damages award only upon a finding of passion, prejudice, or caprice is inconsistent with due process guarantees;

b. Any award of punitive damages serving a compensatory function is inconsistent with due process guarantees;

c. Any award of punitive damages based upon the wealth of the defendant violates due process guarantees;

d. The jury's unfettered power to award punitive damages in any amount it chooses is wholly devoid of meaningful standards and is inconsistent with due process guarantees;

e. Even if it could be argued that the standard governing the imposition of punitive damages exists, the standard is void for vagueness; and

f. The plaintiff's claim for punitive damages violates the Equal Protection Clause of the Fourteenth Amendment of the United States Constitution, and Article I, Section 3 of the South Carolina Constitution in that the amount of punitive damages is based upon the wealth of the defendant.

The plaintiff's claim for punitive damages violates the Federal Doctrine of Separation of Powers and Article I, Section 8 of the South Carolina Constitution for the reason that punitive damages are a creation of the judicial branch of government which invades the province of the legislative branch of government.

WHEREFORE, having fully answered, the defendant, South Carolina High School League, prays that plaintiffs' Complaint, be dismissed as to it, with costs, and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: S / J. Michael Montgomery

Rebecca Laffitte
rlaffitte@sowellgray.com
J. Michael Montgomery
mmontgomery@sowellgray.com
1310 Gadsden Street
Post Office Box 11449
Columbia, South Carolina 29211
(803) 929-1400

Attorneys for Defendant, South Carolina High School League

Columbia, South Carolina

May 3, 2016

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE AMINAH A. RICHBURG, Plaintiff, v. E.A. "RICO" WILLIAMS, DIRECTOR, DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, Defendants.	IN THE COURT OF COMMON PLEAS Docket No.: 2016-CP-23-02113 **ANSWER OF DEFENDANT E.A. "RICO" WILLIAMS (Jury Trial Demanded)**

Defendant E.A. "Rico" Williams, hereby answers the Complaint herein and respectfully shows unto the Court:

1. Defendant denies all allegations that are not specifically admitted herein.

2. Defendant admits the allegations in Paragraph 1.

3. In response to Paragraphs 2 and 3, this Defendant admits that he is the Director of District One of the South Carolina Basketball Officials Association, which operates in Pickens and Greenville counties. The remaining allegations are denied for lack of sufficient knowledge or information.

4. In response to the allegations in Paragraphs 4 and 5, this Defendant admits that Plaintiff has been a member of the District One Basketball Officials Association and that she has provided basketball officiating services through the Association. Except as specifically admitted herein, the allegations are denied.

5. In response to Paragraphs 6 and 7, this Defendant denies that he is "in the business of providing basketball officials." This Defendant is a volunteer Director for the District One Basketball Officials Association. This Defendant further denies the allegations in Paragraphs 6 and 7 of the Complaint.

6. The allegations in Paragraphs 8 and 9 require no response. To the extent a response is required, the allegations are denied.

7. Defendant denies the allegations in Paragraphs 10 and 11 are denied.

8. The allegations in Paragraph 12 are admitted.

9. In response to Paragraph 13, Defendant realleges and incorporates his response to Paragraphs 1 – 12 of the Complaint.

10. Defendant denies the allegations in Paragraphs 14 and 15 (including all sub-parts).

FOR A FIRST AFFIRMATIVE DEFENSE

11. Plaintiff's claims sounding in defamation are barred on the ground that any statements made by this Defendant were true.

FOR A SECOND AFFIRMATIVE DEFENSE

12. Plaintiff's claims sounding in defamation are barred on the ground that any statements made by this Defendant were privileged.

FOR A THIRD AFFIRMATIVE DEFENSE

13. Plaintiff's claims should be dismissed pursuant to Rule 12(b)(6) for failure to state facts sufficient to constitute a cause of action.

FOR A FOURTH AFFIRMATIVE DEFENSE

14. To the extent Plaintiff seeks equitable relief, such relief is barred under the doctrines of unclean hands, waiver and/or estoppel.

AS AN ADDITIONAL DEFENSE

(Punitive Damages)

15. FURTHER ANSWERING, any award of punitive damages would violate the constitutional safeguards provided by the Due Process Clause of the Fourteenth Amendment of the United States Constitution and under the Due Process Clause of Article I, Section 3 of the South Carolina Constitution because the determination of punitive damages does not bear any reasonable relationship to the amount of actual damages, if any, suffered by or awarded.

TURNER PADGET

s/Sarah Day Hurley
Sarah Day Hurley (S.C. Bar No.: 16241)
Post Office Box 1509
Greenville, South Carolina 29602
Direct: 864-552-4651
Fax: 864-282-5965

Attorney for Defendant E.A. "Rico" Williams

Greenville, South Carolina
May 4, 2016

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF GREENVILLE	)	Docket No.: 2015-CP-23-02113
	)	
AMINAH A RICHBURG ,	)	
	)	
Plaintiff,	)	**CERTIFICATE OF SERVICE**
	)	
v.	)	
	)	
E.A. "RICO" WILLIAMS, DIRECTOR, DISTRICT ONE SC BASKETBALL OFFICIALS AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE	)	
	)	
Defendants.	)	

On May 4, 2016, a copy of **Defendants' Answer to Plaintiff's Complaint** was mailed to Pro Se Plaintiff, postage prepaid and properly addressed as follows:

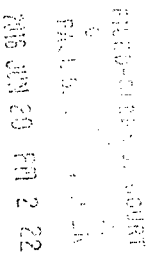
Mr. Aminah A. Richburg
217 Plum Creek Lane
Greenville, SC 29607

Michael Montgomery, Esquire
Sowell Gray Stepp & Laffitte
1310 Gadson Street
Columbia, SC 29201

s/Sarah Day Hurley
Sarah Day Hurley

TPGI 7024134v1

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	
Plaintiff	)	**PLAINTIFF, AMINAH A. RICHBURG, FIRST SET OF CONTINUING INTERROGATORIES TO DEFENDANT**
	)	
vs.	)	
E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE	)	
Defendants	)	



TO: E.A. "RICO" WILLIAMS, DIRECTOR, DISTRICT ONE S.C. BASKETBALL OFFICIALS ASSOCIATION, AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, THE ABOVE NAMED DEFENDANTS:

The Plaintiff, Aminah A. Richburg/ Pro Se, herewith serves upon and requests that the defendants respond to the following First Set of Continuing Interrogatories under oath, pursuant to Rule 33 of the South Carolina Rules of Civil Procedure, and that responses be served upon Aminah A. Richburg, Pro Se/ Plaintiff within thirty (30) days from the date of service of these Interrogatories upon the plaintiff. After responding to the following Interrogatories, should further information called for therein come to the defendant's knowledge, or the knowledge of the defendant's counsel, the defendants are required to properly transmit such other information by supplemental responses to the Interrogatories, in accordance with Rule 26€ of the South Carolina Rules of Civil Procedure.

DEFINITIONS

The following definitions apply to these Interrogatories:

A. The terms "you" and "your" when used herein refer to the defendant above named.
B. The term "identify" when used herein in connection with natural persons means to state their full name, title and job description, if applicable, and their present business and resident addresses, if applicable.
C. The term "identify" when used herein in conjunction with other entities means to state the name an present address of each such entity.
D. When an Interrogatory ask for a description or identification of a document, the response shall be given in sufficient detail to enable a party or person to whom the subpoena or request to produce documents is directed to identify fully the document sought to be produced and to enable counsel for the defendant to determine that such documents, when produced, are in fact the documents described.

E. The term "document" when used herein means all original writings of any nature whatsoever and all non-identical copies thereof in your possession, custody or control, regardless of where located, all all other documents of which you have knowledge and includes, but is not limited to, correspondence, diagrams, other written communication, data processing storage units, tapes, contracts, video cassettes, agreements, notes, schedules, summaries, compilations, analyses, memoranda indices, work papers, studies, surveys, internal and external reports, diaries, calendars, films, photographs, minutes of meetings, invoices, receipts, and all other documents as defined in Rule 34 of the South Carolina Rules of Civil Procedure. In all cases where original and/or non-identical copies are unavailable, "documents" also means copies thereof.

INTERROGATORIES

1. Give the names and address of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.
2. Supply the following information with respect to each individual whose name you have given in the response to the preceding Interrogatory:
   a. Location or locations where any such statements were made;
   b. The identity of the person or persons in whose presence such statement or statements were made;
   c. The time and date upon which such statements were made; and
   d. A summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.
3. Set forth a list of photographs, plats, sketches, or other prepared documents in possession of the party that relate to the claim or defense in the case.
4. Identify every witness known to you or to your attorney who claim to have seen or heard the Plaintiff through its agents, servants, or employees, make any statement or statements pertaining to any of the events or happenings alleged in the Defendant's answer or in the Complaint, as well as a description of those statements.
5. Please provide a copy of all sign in sheets or attendance sheets with arrival times for all members attending meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years.
6. Please provide a copy of all basketball officials that were assigned games with the Plaintiff for the past three (3) years under District One South Carolina Basketball Officials Association and the South Carolina High School League.
7. Please provide a copy of all the school assignments for basketball games for the Plaintiff under the South Carolina High School League through District One South Carolina Basketball Officials association for the past three (3) years
8. The Defendant E.A. "Rico" Williams must provide a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years
9. The Defendant E.A. "Rico" Williams must provide list all of officials assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past (3) years.
10. Please provide the identity of the "Someone" communicated in the email sent by E.A. Rico Williams on Friday, February 5, 2016 at 1:49 pm to the Plaintiff, Skip Lax and others that received the message on behalf of the Plaintiff.

11. Provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico" Williams on February 5, 2016 at 1:49 pm.
12. Provide documentation of the communication for records requested by Bob Wnukowski and Kevin Brown on behalf of the Plaintiff from E.A. "Rico" Williams.
13. Provide documentation of all schools that blocked the Plaintiff and the Schools the Plaintiff blocked for South Carolina High School League/ SCBOA District One officiating services for all sports for District One.
14. Provide a listing of all basketball officials in South Carolina High School League/SCBOA District One that officiate football and volleyball.
15. Provide documentation of South Carolina High School League/ SCBOA District One Board Meeting minutes and sign in sheets with member arrival times from 2013-2016.
16. Provide the documentation of the South Carolina High School League/ SCBOA District One Board Members present for the meeting on February 29, 2916 along with arrival times including the members individual vote/ termination for the Plaintiff.
17. Provide documentation of all ten officials communicated by E.A. "Rico" Williams that blocked the Plaintiff in the South Carolina High School League/ SCBOA District One.
18. Provide all fee's collected by the South Carolina High School League for every coach ejected from a game and penalized financially from 2013-2016.
19. Identify each and every person whom you have retained as an expert, identify:
    a. The subject matter of the expert's anticipated testimony;
    b. The substance of the facts and opinions upon which the expert is expected to testify;
    c. A summary of the grounds for each opinion to which the expert is expected to testify
    d. The educational background and qualifications of the expert; and
    e. Whether, and how many times, the expert has previously testified as an expert in a court of law.

There Interrogatories shall be deemed continuing so as to require supplemental responses prior to trial.

Respectfully submitted,

Aminah A. Richburg

By: _____

Aminah A. Richburg Pro Se/ Plaintiff

217 Plum Creek Lane

Greenville, South Carolina 29607

864-419-6707

Plaintiff/ Pro Se, Aminah A. Richburg

Greenville, South Carolina

June 20, 2016

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE)	
AMINAH A. RICHBURG)	
Plaintiff)	**PLAINTIFF, AMINAH A. RICHBURG, SECOND SET OF CONTINUING INTERROGATORIES TO DEFENDANT**
)	
vs.)	
E.A. "RICO" WILLIAMS, DIRECTOR)	
DISTRICT ONE SC BASKETBALL)	
OFFICIALS ASSOCIATION AND THE)	
SOUTH CAROLINA HIGH SCHOOL)	
LEAGUE)	
)	
Defendants)	

TO: E.A. "RICO" WILLIAMS, DIRECTOR, DISTRICT ONE S.C. BASKETBALL OFFICIALS ASSOCIATION, AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, THE ABOVE NAMED DEFENDANTS:

The Plaintiff, Aminah A. Richburg/ Pro Se, herewith serves upon and requests that the defendants respond to the following First Set of Continuing Interrogatories under oath, pursuant to Rule 33 of the South Carolina Rules of Civil Procedure, and that responses be served upon Aminah A. Richburg, Pro Se/ Plaintiff within thirty (30) days from the date of service of these Interrogatories upon the plaintiff. After responding to the following Interrogatories, should further information called for therein come to the defendant's knowledge, or the knowledge of the defendant's counsel, the defendants are required to properly transmit such other information by supplemental responses to the Interrogatories, in accordance with Rule 26€ of the South Carolina Rules of Civil Procedure.

DEFINITIONS

The following definitions apply to these Interrogatories:

A. The terms "you" and "your" when used herein refer to the defendant above named.
B. The term "identify" when used herein in connection with natural persons means to state their full name, title and job description, if applicable, and their present business and resident addresses, if applicable.
C. The term "identify" when used herein in conjunction with other entities means to state the name an present address of each such entity.
D. When an Interrogatory ask for a description or identification of a document, the response shall be given in sufficient detail to enable a party or person to whom the subpoena or request to produce documents is directed to identify fully the document sought to be produced and to enable counsel for the defendant to determine that such documents, when produced, are in fact the documents described.

E. The term "document" when used herein means all original writings of any nature whatsoever and all non-identical copies thereof in your possession, custody or control, regardless of where located, all other documents of which you have knowledge and includes, but is not limited to, correspondence, diagrams, other written communication, data processing storage units, tapes, contracts, video cassettes, agreements, notes, schedules, summaries, compilations, analyses, memoranda indices, work papers, studies, surveys, internal and external reports, diaries, calendars, films, photographs, minutes of meetings, invoices, receipts, and all other documents as defined in Rule 34 of the South Carolina Rules of Civil Procedure. In all cases where original and/or non-identical copies are unavailable, "documents" also means copies thereof.

INTERROGATORIES

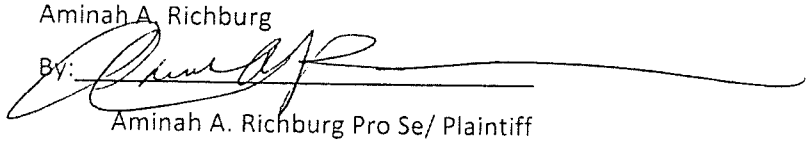
1. Please provide a listing of first and last names of all SCBOA District I officials for 2013-2016.
2. Please provide a listing of first and last names of SCBOA District I officials that officiated games for E.A. "Rico" Williams from 2013-2016.
3. Please provide a listing of first and last names of Board members of the SCBOA District I that officiated games for E.A. "Rico" Williams 2013-2016.
4. Please provide the E.A. "Rico" Williams business game schedules for SCBOA District One Board Members that officiated games through E.A. "Rico" Williams business from 2013-2016.
5. Please provide the game schedules for all basketball contest for SCBOA District One Board Members from 2013-2016 through the South Carolina High School League and SCBOA District One.
6. Please provide a listing of first and last names of SCBOA District One Members terminated for future application for the past five years and reasons for termination.
7. Please provide the number of blocks for each member of the SCBOA District I officials for other officials that are members in the SCBOA District I through the Arbiter from 2013-2016. (The Plaintiff does not seek the names for all blocks for each member of District I SCBOA, only the number).
8. Please provide the number of school blocks for each member of the SCBOA District I officials from 2013-2016 through Arbiter. (The Plaintiff does not seek the names of the schools only the number).
9. Please provide the first and last names of all females that are members of the SCBOA District I from 2013-2016.
10. Please provide the first and last names of all males that are members of the SCBOA District I from 2013-2016.
11. Please provide the ages of all SCBOA District I members along with first and last name from 2013-2016.

12. Please provide the years of experience of all SCBOA District I members from 2013-2016.
13. Please provide Training and Contract Documentation for District I Director, E.A. "Rico" Williams especially with regard to proper communication, confidentiality, grounds to terminate officials, sexual harassment, leadership, and solicitation from 2013-2016.
14. Please provide Training and Contract Documentation for all South Carolina High School League Officials involved in this case especially with regard to SCHSL/SCBOA By-laws, Constitution, State of South Carolina operation requirements, proper communication, grounds to terminate officials, sexual harassment, confidentiality, leadership and solicitation from 2013-2016.
15. Please provide the names and addresses of the supervising/ governing board members of the South Carolina High School League for 2013-2016.

These Interrogatories shall be deemed continuing so as to require supplemental responses prior to trial.

Respectfully submitted,

Aminah A. Richburg

By: 

Aminah A. Richburg Pro Se/ Plaintiff
217 Plum Creek Lane
Greenville, South Carolina 29607
864-419-6707

Plaintiff/ Pro Se, Aminah A. Richburg

Greenville, South Carolina

October 21, 2016

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	
Plaintiff	)	**PLAINTIFF, AMINAH A. RICHBURG, FIRST SET OF REQUEST FOR PRODUCTION TO DEFENDANT**
	)	
vs.	)	
E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE	)	
Defendants	)	

TO: E.A. "RICO" WILLIAMS, DIRECTOR, DISTRICT ONE SOUTH CAROLINA BASKETBALL OFFICALS ASSOCIATION, AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, THE ABOVE-NAMED DEFENDANTS:

The Plaintiff, Aminah A. Richburg, herewith serves upon and request that the Defendants respond to the following First Request for Production under oath, pursuant to Rule 34 of the South Carolina Rules of Civil Procedure, and that responses be served upon Aminah A. Richburg, Pro Se, the above-named plaintiff within thirty (30) days from the date of service of these Request upon the defendants. After responding to the following Requests, should further information called for therein come to the defendant's knowledge, or the knowledge of the defendant's counsel, defendants are required to properly transmit such other information, by supplemental responses to the Request, to these undersigned attorneys in accordance with Rule 26€ of the South Carolina Rules of Civil Procedure.

DEFINITIONS

The following definitions apply to these Requests:

A. The terms "you" and "your" when used herein refer to the Defendant above named.
B. The term "identify" when used herein in connection with natural persons means to state their full name, title, and job description, if applicable, and their present business and resident addresses (this term applies to all individuals).

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C. The term "identify" when used in connection with business entities means to state the business name and present address of each said entity.

D. When the Request ask for a description or identification of a document, the response shall be given in sufficient detail to enable a party or person to whom a subpoena or request to produce documents is directly to identify fully the document sought to be produced and to enable counsel for the plaintiff Aminah A. Richburg Pro Se to determine that such documents, when produced, are in fact the documents so described.

E. The term "document" when used herein, means all original writing of any nature or kind whatsoever and all identical copies thereof, in your possession, custody or control regardless of where located, and all other documents of which you have knowledge and includes, but is not limited to, correspondence, diagrams, or other written communications, data processing storage units, tapes, contracts, agreements, notes, schedules, summaries, compilations, analysis, memoranda, indices, work papers, studies, surveys, internal and external reports, diaries, calendars, films, photographs, minutes of meetings, invoices, receipts, bills, orders, confirmations, bills of lading, delivery receipts, and other documents as identified in Rule 34 of the South Carolina Rules of Civil Procedure. In all cases where original and/or non-identical copies are available, "documents" also means copies thereof.

REQUEST FOR PRODUCTION

1. Please produce all statements or any other written or printed documents relating to the claim set forth in the Defendants answer to the Plaintiff's Complaint.
2. Please produce all photographs, diagrams, drawings, videocassettes, audiocassettes, or other similar material set forth in the Defendants answer to the Plaintiff's Complaint.
3. Please produce all statements of possible witnesses, whether written, oral, summarized, or otherwise produced in any manner, set forth in the Defendants answer to the Plaintiff's Complaint.
4. Please produce all tax returns of the Defendants. Both Federal and State returns, for the five (5) years preceding the incident set forth in the Defendants answer to the Plaintiff's Complaint as well as any returns made subsequent to the Defendants answer to the Plaintiff's Complaint.
5. Please provide any documents or things not heretofore requested which relate to the Plaintiff's First Set of Continuing Interrogatories, served herewith, or which were relied upon, referred to, or otherwise referenced or consulted in connection with the Defendant's responses to the Plaintiff's First Set of Continuing Interrogatories, served herewith.
6. Please provide any other documents or materials which you intend to introduce in the trail of this case.

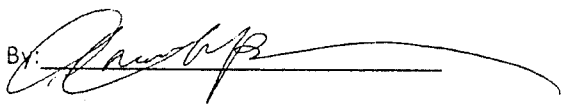
7. Please provide copies of any documents received via subpoena or subject to a Freedom of Information Act request relating to the Defendants answer to the Plaintiff's Complaint.

If you contend any item need not be produced, identify such item and set forth the basis for your failure to produce same.

It is requested that this production be made within thirty (30) days after the date of service of this Request at Aminah A. Richburg Plaintiff /Pro Se 217 Plum Creek Lane, Greenville, South Carolina 29607. Visual inspection and copies may be made of any and all documents.

Respectfully submitted,

Aminah A. Richburg Plaintiff/ Pro Se

By: 

Aminah A. Richburg

217 Plum Creek Lane

Greenville, South Carolina 29607

(864) 419-6707

Pro Se for Plaintiff, Aminah A. Richburg

Greenville, South Carolina

June 20,2016

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	)	IN THE COURT OF COMMON PLEAS
Aminah A. Richburg, Plaintiff, vs. E.A. "Rico" Williams, Director, District One S.C. Basketball Officials Association, and the South Carolina High School League, Defendants.	)	Civil Action No. 2016-CP-23-02113 DEFENDANT'S, SOUTH CAROLINA HIGH SCHOOL LEAGUE'S, RESPONSES TO PLAINTIFF'S FIRST SET OF CONTINUING INTERROGATORIES

TO: AMINAH A. RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

The defendant, South Carolina High School League (hereinafter "SCHSL"), herein responds to Plaintiff's First Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure.

GENERAL OBJECTIONS

1. The defendant, SCHSL, objects to each Interrogatory to the extent that it seeks information or documents which were compiled in anticipation of litigation or for trial and which are protected by the attorney-client, work-product doctrines. This defendant further objects to each and every Interrogatory to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.

2. Any information produced in response hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or intending to waive any objections that the defendant, SCHSL, may have with respect to the subsequent use of such information and this defendant respectfully reserves:

a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;

b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, on any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and

c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. The defendant, SCHSL, objects to each and every Interrogatory to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this defendant.

4. The defendant, SCHSL, objects to each and every Interrogatory to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This defendant further objects to each and every Interrogatory to the extent it seeks information not limited in time, nature, and scope.

5. The defendant, SCHSL, objects to each and every Interrogatory to the extent that it seeks confidential or proprietary information. Similarly, this defendant reserves the right to redact sensitive or proprietary information from any documents that it produces in response hereunder.

6. The defendant, SCHSL, states that its agreement to produce documents responsive to these Interrogatories is to produce any documents in its possession and control, and to the extent which they exist, for inspection in the offices of Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

INTERROGATORIES

1. Give the names and address of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.

RESPONSE:

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

No written or recorded statement has been provided.

Ms. Richburg is the plaintiff and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

b. Rico Williams
Address unknown

No written or recorded statement has been provided.

Mr. Williams is the director for District One of the SC Basketball Officials Association and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

c. Skip Lax
c/o undersigned counsel

No written or recorded statement has been provided.

Mr. Lax is employed by the South Carolina High School League and is expected to testify as to his communication with the plaintiff regarding the incident that is the subject of this matter.

d. Members of the District One Board of Directors (names unknown)

No written or recorded statements have been provided.

Members of the District One Board of Directors are expected to testify as to the reason for any decisions regarding plaintiff's future application for membership.

e. The defendant, SCHSL, reserves the right to identify other witnesses whose names become known during the course of discovery.

2. Supply the following information with respect to each individual whose name you have given in the response to the preceding interrogatory:

a. Location or locations where any such statements were made;

b. The identity of the person or persons in whose presence such statement or statements were made;

c. The time and date upon which such statements were made; and

d. A summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

RESPONSE: Not applicable, as the defendant is not in possession of any written or recorded statements.

3. Set forth a list of photographs, plats, sketches, or other prepared documents in possession of the party that relate to the claim or defense in the case.

RESPONSE: The defendant, SCHSL, is in possession of the following:

a. Sample officials application which includes the Code of Ethics for all officials (Bates labeled 001-002)

b. Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.

c. Email correspondence received by Skip Lax on February 5, 2016 (Bates labeled 012-013)

d. Email correspondence between Skip Lax and Aminah Richburg on February 9-11, 2016 (Bates labeled 014-018)

e. Email correspondence received by Skip Lax on March 14, 2016 (Bates labeled 019-020)

f. Email correspondence received by Skip Lax on March 21, 2016 (Bates labeled 021)

g. Ratings for all basketball officials for 2014-2015 and 2015-2016 (Bates labeled 022-036)

h. List of basketball and football officials for District One (Bates labeled 037-044)

4. Identify every witness known to you or to your attorney who claim to have seen or heard the Plaintiff through its agents, servants, or employees, make any statement or statements pertaining to any of the events or happenings alleged in the Defendant's answer or in the Complaint, as well as a description of those statements.

RESPONSE: The defendant, SCHSL, would refer to the email correspondence provided by Rico Williams, which is referenced above.

5. Please provide a copy of all sign in sheets or attendance sheets with arrival times for all members attending meetings for the District One South Carolina

Basketball Officials Association and the South Carolina High School League for the past five (5) years.

RESPONSE: The defendant, SCHSL, does not keep or maintain sign-in sheets or attendance sheets for meetings of the District One Basketball Officials Association, and it would refer to the defendant, Rico Williams, for any documents that may be responsive to this Request.

6. Please provide a copy of all basketball officials that were assigned games with the Plaintiff for the past three (3) years under District One South Carolina Basketball Officials Association and the South Carolina High School League.

RESPONSE: The defendant, SCHSL, does not maintain records of other officials that would have been assigned games with the plaintiff directly from the SCHSL for varsity sports through Arbiter. The defendant, SCHSL, would refer to the defendant, Rico Williams, for any documents he may have regarding sub-varsity contests that would have been assigned at the district level.

7. Please provide a copy of all the school assignments for basketball games for the Plaintiff under the South Carolina High School League through District One South Carolina Basketball Officials association for the past three (3) years.

RESPONSE: The defendant, SCHSL, is only in possession of assignments for varsity contests through Arbiter. Based on the Arbiter records, plaintiff was not assigned varsity basketball contests in 2014-2015 or 2015-2016. The defendant, SCHSL, would refer to the defendant, Rico Williams, for any documents he may have regarding sub-varsity contests that would have been assigned at the district level.

8. The Defendant E.A. "Rico" Williams must provide a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years.

RESPONSE: Not applicable.

9. The Defendant E.A. "Rico" Williams must provide list all of officials assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past (3) years.

RESPONSE: Not applicable.

10. Please provide the identity of the "Someone" communicated in the email sent by E.A. Rico Williams on Friday, February 5, 2016 at 1:49 p.m. to the Plaintiff, Skip Lax and others that received the message on behalf of the Plaintiff.

RESPONSE: The defendant, SCHSL, does not know the identity of the person in question.

11. Provide background of Individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico" Williams on February 5, 2016 at 1:49 p.m.

RESPONSE: The defendant, SCHSL, does not know the background, names, and affiliations of all of the recipients of the email in question. The defendant, SCHSL, is only aware that several of the recipients- albanister77@gmail.com; audrex.cox94@yahoo.com; hullingerge@yahoo.com; and ken@kenpelanda.com- are current or former officials.

12. Provide documentation of the communication for records requested by Bob Wnukowski and Kevin Brown on behalf of the Plaintiff from E.A. "Rico" Williams.

RESPONSE: The defendant, SCHSL, did not request records and therefore is not in possession of documents responsive to this Request.

13. Provide documentation of all schools that blocked the Plaintiff and the Schools the Plaintiff blocked for South Carolina High School League/ SCBOA District One officiating services for all sports for District One.

RESPONSE: The defendant, SCHSL, is in possession of the names of schools that blocked the plaintiff through the Arbiter software, which would only apply to varsity contests for the SCHSL. Due to the sensitive and private nature of the request, the defendant, SCHSL, will provide this information upon entry of a Protective Order.

14. Provide a listing of all basketball officials in South Carolina High School League/SCBOA District One that officiate football and volleyball.

RESPONSE: Please see the attached list.

15. Provide documentation of South Carolina High School League/SCBOA District One Board Meeting minutes and sign In sheets with member arrival times from 2013-2016.

RESPONSE: The defendant, SCHSL, does not keep or maintain sign-in sheets or attendance sheets for meetings of the District One Basketball Officials Association, and it would refer to the defendant, Rico Williams, for any documents that may be responsive to this Request.

16. Provide the documentation of the South Carolina High School League/ SCBOA District One Board Members present for the meeting on February 29, 2916 along with arrival times including the members Individual vote/ termination for the Plaintiff.

RESPONSE: The defendant, SCHSL, was not involved in this meeting and no one from its office attended the meeting on February 29, 2016. Therefore, it does not have any documents responsive to this Request.

17. Provide documentation of all ten officials communicated by E.A. "Rico" Williams that blocked the Plaintiff in the South Carolina High School League/ SCBOA District One.

RESPONSE: The defendant, SCHSL, is in possession of the names of officials that blocked the plaintiff through the Arbiter software, which would only apply to varsity contests for the SCHSL. Due to the sensitive and private nature of the request, the defendant, SCHSL, will provide this information upon entry of a Protective Order.

18. Provide all fees collected by the South Carolina High School League for every coach ejected from a game and penalized financially from 2013-2016.

RESPONSE: The defendant, SCHSL, objects to this Interrogatory on the grounds that it is overbroad, irrelevant, and not calculated to lead to the discovery of admissible evidence. Not waiving this objection, the South Carolina High School League has not calculated the total number of fees collected, but it would respond that there were thirty-three (33) basketball coach ejections from 2013-2016, and the fines for ejections range from $100-$500.

19. Identify each and every person whom you have retained as an expert, identify:

a. The subject matter of the expert's anticipated testimony;

b. The substance of the facts and opinions upon which the expert is expected to testify;

c. A summary of the grounds for each opinion to which the expert is expected to testify

d. The educational background and qualifications of the expert; and

e. Whether, and how many times, the expert has previously testified as an expert in a court of law.

RESPONSE: The defendant, SCHSL, has not retained an expert but will supplement this Response should an expert be retained.

Respectfully submitted,

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: _____

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Attorneys for Defendant, South Carolina High School League

Columbia, South Carolina

August 23, 2016

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	)	IN THE COURT OF COMMON PLEAS
Aminah A. Richburg, Plaintiff, vs. E.A. "Rico" Williams, Director, District One S.C. Basketball Officials Association, and the South Carolina High School League, Defendants.	)	Civil Action No. 2016-CP-23-02113 DEFENDANT'S, SOUTH CAROLINA HIGH SCHOOL LEAGUE'S, RESPONSES TO PLAINTIFF'S SECOND SET OF CONTINUING INTERROGATORIES

TO: AMINAH A. RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

The defendant, South Carolina High School League (hereinafter "SCHSL"), herein responds to Plaintiff's Second Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure.

GENERAL OBJECTIONS

1. The defendant, SCHSL, objects to each Interrogatory to the extent that it seeks information or documents which were compiled in anticipation of litigation or for trial and which are protected by the attorney-client, work-product doctrines. This defendant further objects to each and every Interrogatory to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.

2. Any information produced in response hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or intending to waive any objections that the defendant, SCHSL, may have with respect to the subsequent use of such information and this defendant respectfully reserves:

a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;

b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, on any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and

c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. The defendant, SCHSL, objects to each and every Interrogatory to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this defendant.

4. The defendant, SCHSL, objects to each and every Interrogatory to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This defendant further objects to each and every Interrogatory to the extent it seeks information not limited in time, nature, and scope.

5. The defendant, SCHSL, objects to each and every Interrogatory to the extent that it seeks confidential or proprietary information. Similarly, this defendant reserves the right to redact sensitive or proprietary information from any documents that it produces in response hereunder.

6. The defendant, SCHSL, states that its agreement to produce documents responsive to these Interrogatories is to produce any documents in its possession and control, and to the extent which they exist, for inspection in the offices of Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

INTERROGATORIES

1. Please provide a listing of first and last names of all SCBOA District I officials for 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all SCBOA District I officials from 2013-2016. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each official by name, district, years of experience, and rating. The defendant, SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled SCHSL 045-075). Again, these rankings would provide the first and last names of all SCBOA District I officials for 2013-2016.

2. Please provide a listing of first and last names of SCBOA District I officials that officiated games for E.A. "Rico" Williams from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the

needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

3. Please provide a listing of first and last names of Board members of the SCBOA District I that officiated games for E.A. "Rico" Williams 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

4. Please provide the E.A. "Rico" Williams business game schedules for SCBOA District One Board Members that officiated games through E.A. "Rico" Williams business from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

5. Please provide the game schedules for all basketball contest for SCBOA District One Board Members from 2013-2016 through the South Carolina High School League and SCBOA District One.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and

not proportional to the needs of the case. Further responding, the defendant, South Carolina High School League, would only have access to varsity contests but would not be able to easily retrieve this information, as game schedules for varsity basketball contests are purged every year by Arbiter.

6. Please provide a listing of first and last names of SCBOA District One Members terminated for future application for the past five years and reasons for termination.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

7. Please provide the number of blocks for each member of the SCBOA District I officials for other officials that are members in the SCBOA District I through the Arbiter from 2013-2016. (The Plaintiff does not seek the names for all blocks for each member of District I SCBOA, only the number).

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not proportional to the needs of the case. Further responding, the defendant, South Carolina High School League, would only have access to blocks for varsity contests but would not be able to easily retrieve this information, as it would have to separately access each official's profile. Moreover, the current number of blocks may not accurately represent the number of blocks in prior years, as officials can adjust blocks at any time.

8. Please provide the number of school blocks for each member of the SCBOA District I officials from 2013-2016 through Arbiter. (The Plaintiff does not seek the names of the schools only the number).

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not proportional to the needs of the case. Further responding, the defendant, South Carolina High School League, would only have access to blocks for varsity contests but would not be able to easily retrieve this information, as it would have to separately access each official's profile. Moreover, the current number of school blocks may not accurately represent the number of blocks in prior years, as schools and officials can adjust blocks at any time.

9. Please provide the first and last names of all females that are members of the SCBOA District I from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District I that is grouped by gender, age, or experience. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each official by name, district, years of experience, and rating. The defendant, SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled

SCHSL 045-075). Again, these rankings would provide the first and last names of all SCBOA District I officials for 2013-2016, from which their gender could be gleaned.

10. Please provide the first and last names of all males that are members of the SCBOA District I from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District I that is grouped by gender, age, or experience. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each official by name, district, years of experience, and rating. The defendant, SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled SCHSL 045-075). Again, these rankings would provide the first and last names of all SCBOA District I officials for 2013-2016, from which their gender could be gleaned.

11. Please provide the ages of all SCBOA District I members along with first and last name from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District I that is organized by age.

12. Please provide the years of experience of all SCBOA District I members from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District I that is grouped by gender, age, or experience. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each official by name, district, years of experience, and rating. The defendant, SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled SCHSL 045-075). Again, these rankings would provide the years of experience of all SCBOA District I officials for 2013-2016.

13. Please provide Training and Contract Documentation for District I Director, E.A. "Rico" Williams especially with regard to proper communication, confidentiality, grounds to terminate officials, sexual harassment, leadership, and solicitation from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad, vague, and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

14. Please provide Training and Contract Documentation for all South Carolina High School League Officials involved in this case especially with regard to SCHSL/SCBOA By-laws, Constitution, State of South Carolina operation requirements, proper communication, grounds to terminate officials, sexual harassment, confidentiality, leadership and solicitation from 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad, vague, and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, is hereby producing the SCBOA Directory for the 2015-2016 school year (labeled SCHSL 076-100), which includes the SCBOA's Constitution and other rules.

15. Please provide the names and addresses of the supervising/governing board members of the South Carolina High School League for 2013-2016.

RESPONSE: The defendant, South Carolina High School League, objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, is hereby producing a document that provides the names of the governing board members of the South Carolina High School League that would include the years 2013-2016 (labeled SCHSL 101-105).

(Signature page to follow.)

Respectfully submitted,

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: _____

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Attorneys for Defendant, South Carolina High School League

Columbia, South Carolina

November 21, 2016

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	)	IN THE COURT OF COMMON PLEAS
Aminah A. Richburg, Plaintiff, vs. E.A. "Rico" Williams, Director, District One S.C. Basketball Officials Association, and the South Carolina High School League, Defendants.	)	Civil Action No. 2016-CP-23-02113 **DEFENDANT'S, SOUTH CAROLINA HIGH SCHOOL LEAGUE'S, RESPONSES TO PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION**

TO: AMINAH A. RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

The defendant, South Carolina High School League (hereinafter "SCHSL"), herein responds to Plaintiff's First Set of Requests for Production pursuant to Rule 34 of the South Carolina Rules of Civil Procedure.

GENERAL OBJECTIONS

1. The defendant, SCHSL, objects to each Request to the extent that it seeks information or documents which were compiled in anticipation of litigation or for trial and which are protected by the attorney work-product doctrine. This defendant further objects to each and every discovery request to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.

2. Any information produced in response hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or intending to waive any objections that the defendant, SCHSL, may have with respect to the subsequent use of such information and this defendant respectfully reserves:

a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;

b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, on any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and

c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. The defendant, SCHSL, objects to each and every discovery request to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this defendant.

4. The defendant, SCHSL, objects to each and every discovery request to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This defendant further objects to each and every discovery request to the extent it seeks information not limited in time, nature, and scope.

5. The defendant, SCHSL, objects to each and every discovery request to the extent that it seeks confidential or proprietary information. Similarly, this defendant reserves the right to redact sensitive or proprietary information from any documents that it produces in response hereunder.

6. The defendant, SCHSL, states that its agreement to produce documents responsive to these Requests is to produce any documents in its possession and control, and to the extent which they exist, for inspection in the offices of Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

REQUESTS FOR PRODUCTION

1. Please produce all statements or any other written or printed documents relating to the claim set forth in the Defendants answer to the Plaintiff's Complaint.

RESPONSE: The defendant, SCHSL, is in possession of the following:

a. Sample officials application which includes the Code of Ethics for all officials (Bates labeled 001-002)

b. Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.

c. Email correspondence received by Skip Lax on February 5, 2016 (Bates labeled 012-013)

d. Email correspondence between Skip Lax and Aminah Richburg on February 9-11, 2016 (Bates labeled 014-018)

e. Email correspondence received by Skip Lax on March 14, 2016 (Bates labeled 019-020)

f. Email correspondence received by Skip Lax on March 21, 2016 (Bates labeled 021)

g. Ratings for all basketball officials for 2014-2015 and 2015-2016 (Bates labeled 022-036)

h. List of basketball and football officials for District One (Bates labeled 037-044)

2. Please produce all photographs, diagrams, drawings, videocassettes, audiocassettes, or other similar material set forth in the Defendants answer to the Plaintiff's Complaint.

RESPONSE: The defendant, SCHSL, is not in possession of documents responsive to this Request.

3. Please produce all statements of possible witnesses, whether written, oral, summarized, or otherwise produced in any manner, set forth in the Defendant's answer to the Plaintiff's Complaint.

RESPONSE: The defendant, SCHSL, is not in possession of documents responsive to this Request.

4. Please produce all tax returns of the Defendants. Both Federal and State returns, for the five (5) years preceding the incident set forth in the Defendant's answer to the Plaintiff's Complaint as well as any returns made subsequent to the Defendant's answer to the Plaintiff's Complaint.

RESPONSE: The defendant, SCHSL, objects to this Interrogatory on the grounds that it is overbroad, irrelevant, and not calculated to lead to the discovery of admissible evidence.

5. Please provide any documents or things not heretofore requested which relate to the Plaintiff's First Set of Continuing Interrogatories, served herewith, or which were relied upon, referred to, or otherwise referenced or consulted in connection with the Defendant's responses to the Plaintiff's First Set of Continuing Interrogatories, served herewith.

RESPONSE: Please see Response to Request No. 1, above.

6. Please provide any other documents or materials which you intend to introduce in the trial of this case.

RESPONSE: The defendant, SCHSL, would respond that it is premature to determine which documents or materials it will seek to introduce at the trial of this case, and it will supplement this Response following discovery and before trial. Furthermore, the defendant would refer to the items listed in Response to Request No. 1 as documents it may seek to introduce.

7. Please provide copies of any documents received via subpoena or subject to a Freedom of information Act request relating to the Defendant's answer to the Plaintiff's Complaint.

RESPONSE: Not applicable at this time.

Respectfully submitted,

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: _____

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Attorneys for Defendant, South Carolina High School League

Columbia, South Carolina

August 23, 2016

STATE OF SOUTH CAROLINA) COUNTY OF GREENVILLE	IN THE COURT OF COMMON PLEAS Civil Action No. 2016-CP-23-02113
AMINAH A. RICHBURG, Plaintiff, vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, Defendants.	**DEFENDANT'S RESPONSES TO PLAINTIFF'S FIRST SET OF REQUEST FOR PRODUCTION**

TO: AMINAH RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

Defendant E.A. "Rico" Williams ("Defendant") herein responds to Plaintiff's First Set of Requests for Production pursuant to Rule 34 of the South Carolina Rules of Civil Procedure.

GENERAL OBJECTIONS

1. Defendant objects to each Request to the extent that it seeks information or documents which were compiled in anticipation of litigation or for trial and which are protected by the attorney work-product doctrine. This Defendant further objects to each and every discovery request to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.

2. Any information produced in response hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or

intending to waive any objections that the Defendant may have with respect to the subsequent use of such information and this defendant respectfully reserves:

a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;

b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, on any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and

c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. Defendant objects to each and every discovery request to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this Defendant.

4. Defendant objects to each and every discovery request to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This Defendant further objects to each and every discovery request to the extent it seeks information not limited in time, nature, and scope.

5. Defendant objects to each and every discovery request to the extent that it seeks confidential or proprietary information. Similarly, this Defendant reserves the right to redact sensitive or proprietary information from any documents that it produces in response hereunder.

6. Defendant states that its agreement to produce documents responsive to these Requests is to produce any documents in its possession and control, and to the extent which

they exist, for inspection in the offices of Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601.

REQUESTS FOR PRODUCTION

1. Please produce all statements or any other written or printed documents relating to the claim set forth in the Defendants answer to the Plaintiff's Complaint.

   RESPONSE: **Defendant is in possession of the following documents:**

   a. **SCBOA District 1 Contracts with Plaintiff for 2014 and 2015;**
   b. **Code of Ethics for the South Carolina Basketball Officials Association;**
   c. **February 5, 2016 email from Rico Williams to Aminah Richburg;**
   d. **February 22, 2016 email from Joedy Moots to Aminah Richburg;**
   e. **March 14, 2016 emails (two) from Rich Williams to: Skip Lax, Jerome Singleton, and Joedy Moots;**
   f. **March 21, 2016 email from Rico Williams to Aminah Richburg, with copies to Jerome Singleton, Skip Lax, Joedy Moots, and District One Board members;**
   g. **SCBOA District One Board meeting minutes from February 29, 2016.**

2. Please produce all photographs, diagrams, drawings, videocassettes, audiocassettes, or other similar material set forth in the Defendants answer to the Plaintiff's Complaint.

   RESPONSE: **See documents produced herewith.**

3. Please produce all statements of possible witnesses, whether written, oral, summarized, or otherwise produced in any manner, set forth in the Defendants answer to the Plaintiff's Complaint.

   RESPONSE: **Defendant is not in possession of any witness statements.**

4. Please produce all tax returns of the Defendants. Both Federal and State returns, for the five (5) years preceding the incident set forth in the Defendants answer to the Plaintiff's Complaint as well as any returns made subsequent to the Defendants answer to the Plaintiff's Complaint.

RESPONSE: **Defendant objects to this Request on the grounds the information sought is not relevant to any claim or defense in this action, and is not reasonably calculated to lead to the discovery of admissible evidence.**

5. Please provide any documents or things not heretofore requested which relate to the Plaintiff's First Set of Continuing Interrogatories, served herewith, or which were relied upon, referred to, or otherwise referenced or consulted in connection with the Defendant's responses to the Plaintiff's First Set of Continuing Interrogatories, served herewith.

RESPONSE: **See Response to Request No. 1 above.**

6. Please provide any other documents or materials which you intend to introduce in the trial of this case.

RESPONSE: **Defendant would respond that it is premature to determine which documents or materials he and his counsel will seek to introduce at the trial of this case, and he will supplement this Response following discovery and before trial. Furthermore, Defendant would refer Plaintiff to the items listed in Response to Request No. 1 as documents he may seek to introduce.**

7. Please provide copies of any documents received via subpoena or subject to a Freedom of Information Act request relating to the Defendants answer to the Plaintiff's Complaint.

RESPONSE: **None at this time.**

TURNER PADGET GRAHAM & LANEY P.A.

By: Sarah Day Hurley

Sarah Day Hurley
P.O. Box 2116
Myrtle Beach, South Carolina 29578
Telephone: (843) 213-5500
Fax: (843) 213-5555

ATTORNEYS FOR DEFENDANT
E.A. "RICO" WILLIAMS

August 25, 2016

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	IN THE COURT OF COMMON PLEAS Civil Action No. 2016-CP-23-02113
AMINAH A. RICHBURG, Plaintiff, vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, Defendants.	**DEFENDANTS' ANSWERS TO PLAINTIFF'S FIRST SET OF CONTINUING INTERROGATORIES**

TO: AMINAH RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

Defendant E.A. "Rico" Williams ("Defendant") herein responds to Plaintiff's First Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure.

GENERAL OBJECTIONS

1. Defendant objects to each Interrogatory to the extent that it seeks information or documents which were compiled in anticipation of litigation or for trial and which are protected by the attorney-client, work-product doctrines. This Defendant further objects to each and every Interrogatory to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.

2. Any information produced in response hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or

intending to waive any objections that this Defendant may have with respect to the subsequent use of such information and this defendant respectfully reserves:

a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;

b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, on any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and

c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. Defendant objects to each and every Interrogatory to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this Defendant.

4. Defendant objects to each and every Interrogatory to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This defendant further objects to each and every Interrogatory to the extent it seeks information not limited in time, nature, and scope.

5. Defendant objects to each and every Interrogatory to the extent that it seeks confidential or proprietary information. Similarly, this Defendant reserves the right to redact sensitive or proprietary information from any documents that he produces in response hereunder.

6. Defendant states that his agreement to produce documents responsive to these Interrogatories is to produce any documents in its possession and control, and to the extent

which they exist, for inspection in the offices of Turner Padget, 200 East Broad Street, Suite 250, 29601.

INTERROGATORIES

1. Give the names and address of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.

RESPONSE:

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

No written or recorded statement has been provided.

Ms. Richburg is the plaintiff and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

b. **Rico Williams**
1 Ridgeside Court
Greenville, SC 29617

Mr. Williams may be contacted through his undersigned counsel.

No written or recorded statement has been provided.

Mr. Williams is the director for District One of the SC Basketball Officials Association and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

c. **Skip Lax**
[address unknown]

No written or recorded statement has been provided.

Mr. Lax is employed by the South Carolina High School League and is expected to testify as to his communication with

the plaintiff regarding the incident that is the subject of this matter.

d. **Members of the District One Board of Directors (names to be provided)**

No written or recorded statements have been provided.

Members of the District One Board of Directors are expected to testify as to the reason for any decisions regarding plaintiff's future application for membership.

e. **This Defendant reserves the right to identify other witnesses whose names become known during the course of discovery.**

2. Supply the following information with respect to each individual whose name you have given in the response to the preceding Interrogatory:

a. Location or locations where any such statements were made;

b. The identity of the person or persons in whose presence such statement or statements were made;

c. The time and date upon which such statements were made; and

d. A summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

RESPONSE: **Not applicable, as Defendant is not in possession of any written or recorded statements.**

3. Set forth a list of photographs, plats, sketches, or other prepared documents in possession of the party that relate to the claim or defense in the case.

RESPONSE:

Defendant is in possession of the following documents:

a. **SCBOA District 1 Contracts with Plaintiff for 2014 and 2015;**

b. **Code of Ethics for the South Carolina Basketball Officials Association;**

c. **February 5, 2016 email from Rico Williams to Aminah Richburg;**

d. **February 22, 2016 email from Joedy Moots to Aminah Richburg;**

e. **March 14, 2016 emails (two) from Rich Williams to: Skip Lax, Jerome Singleton, and Joedy Moots;**

f. **March 21, 2016 email from Rico Williams to Aminah Richburg, with copies to Jerome Singleton, Skip Lax, Joedy Moots, and District One Board members;**

g. **SCBOA District One Board meeting minutes from February 29, 2016.**

4. Identify every witness known to you or to your attorney who claim to have seen or heard the Plaintiff through its agents, servants, or employees, make any statement or statements pertaining to any of the events or happenings alleged in the Defendant's answer or in the Complaint, as well as a description of those statements.

RESPONSE: **Defendant would refer Plaintiff to the emails produced herewith. In addition, Defendant would refer Plaintiff to the minutes of the SCBOA Board meeting on February 29, 2016 and the list of the Board members in attendance at that meeting.**

5. Please provide a copy of all sign in sheets or attendance sheets with arrival times for all members attending meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years.

RESPONSE: **Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.**

6. Please provide a copy of all basketball officials that were assigned games with the Plaintiff for the past three (3) years under District One South Carolina Basketball Officials Association and the South Carolina High School League.

RESPONSE: Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

7. Please provide a copy of all the school assignments for basketball games for the Plaintiff under the South Carolina High School League through District One South Carolina Basketball Officials association for the past three (3) years

RESPONSE: Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

8. The Defendant E.A. "Rico" Williams must provide a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years

RESPONSE: Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

9. The Defendant E.A. "Rico" Williams must provide list all of officials assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past (3) years.

RESPONSE: Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

10. Please provide the identity of the "Someone" communicated in the email sent by E.A. Rico Williams on Friday, February 5, 2016 at 1:49 pm to the Plaintiff, Skip Lax and others that received the message on behalf of the Plaintiff.

RESPONSE: John Williams.

11. Provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico" Williams on February 5, 2016 at 1:49 pm.

RESPONSE: **Defendant objects to this request on the grounds that it is overly broad, and also vague to the extent it seeks the "affiliations" of such individuals. Subject to and without waiving this objection, Defendant will supplement this response with a list of the SCBOA Board members and their addresses, to the extent known.**

12. Provide documentation of the communication for records requested by Bob Wnukowski and Kevin Brown on behalf of the Plaintiff from E.A. "Rico" Williams.

RESPONSE: **Defendant is not in possession of any documentation responsive to this request. All communications were by telephone.**

13. Provide documentation of all schools that blocked the Plaintiff and the Schools the Plaintiff blocked for South Carolina High School League/ SCBOA District One officiating services for all sports for District One.

RESPONSE: **Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.**

14. Provide a listing of all basketball officials in South Carolina High School League/SCBOA District One that officiate football and volleyball.

RESPONSE: **Defendant will conduct a search of the SCBOA District One records and supplement this response to the extent such information may be obtained.**

15. Provide documentation of South Carolina High School League/ SCBOA District One Board Meeting minutes and sign in sheets with member arrival times from 2013-2016.

RESPONSE: **Defendant objects to this Interrogatory to the extent it seeks information beyond the issues and claims in this case. Subject to this objection, Defendant will produce any minutes of the February 29, 2016 of the SCBOA Board meeting, as well as the sign-in sheets for the SCBOA District One meetings to the extent such information may be obtained.**

16. Provide the documentation of the South Carolina High School League/ SCBOA District One Board Members present for the meeting on February 29, 2916 along with arrival times including the members individual vote/ termination for the Plaintiff.

RESPONSE:

Defendant will supplement this response upon receipt of the meeting minutes, from which the information sought may be obtained.

17. Provide documentation of all ten officials communicated by E.A. "Rico" Williams that blocked the Plaintiff in the South Carolina High School League/ SCBOA District One.

RESPONSE: **Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.**

18. Provide all fee's collected by the South Carolina High School League for every coach ejected from a game and penalized financially from 2013-2016.

RESPONSE: **This Defendant is not in possession of the information sought.**

19. Identify each and every person whom you have retained as an expert, identify:

a. The subject matter of the expert's anticipated testimony;

b. The substance of the facts and opinions upon which the expert is expected to testify;

c. A summary of the grounds for each opinion to which the expert is expected to testify

d. The educational background and qualifications of the expert; and

e. Whether, and how many times, the expert has previously testified as an expert in a court of law.

RESPONSE: **Defendant has not retained an expert but will supplement this Response should an expert be retained to testify at trial.**

TURNER PADGET GRAHAM & LANEY P.A.

By: Sarah Day Hurley

Sarah Day Hurley
P.O. Box 1509
Greenville, South Carolina 29602
Telephone: (864) 552-4600
Fax: (864) 552-4620

ATTORNEY FOR DEFENDANT
E.A. "RICO" WILLIAMS

August 25, 2016

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	
Plaintiff	)	**REQUEST FOR HEARING**
	)	
Vs.	)	
E.A. "RICO" WILLIAMS, DIRECTOR	)	
DISTRICT ONE SC BASKETBALL	)	
OFFICIALS ASSOCIATION AND THE	)	
SOUTH CAROLINA HIGH SCHOOL	)	
LEAGUE	)	
	)	
Defendants	)	

Plaintiff's Attorney: Pro Se Aminah A. Richburg

Mailing Address: 217 Plum Creek Lane Greenville, SC 29607

Telephone: 864-419-6707

Email: richburga@bellsouth.net

Defendants' Attorney: Michael Montgomery

Mailing Address P.O. Box 11449 Columbia, SC 29211

Telephone:

Email:

Defendants' Attorney: Sarah Day Hurley

Mailing Address: Post Office Box 1509 Greenville, SC 29602

Telephone: 864-552-4651 Fax: 864-282-5965

Email:

Type of Hearing: Civil Case

Time Needed: 2 hours

Dates and Times Unavailable: I (Aminah A. Richburg) work for Greenville County Schools and will be unavailable when I am under contract beginning August 9, 2016 Through June 6, 2017 from 7:45 am to 3:30 pm. Special arrangements will be necessary for me to leave work early for proposed court time beginning at 3:00 until 5:00 from my building principal.

Comments and Issues: The Defendants and their Attorneys have engaged in wrongful conduct. I submitted A First Set of Request for Production to Defendant and First Set of Continuing Interrogatories to Defendants on June 20, 2016 and

both Michael Montgomery and Sarah Day Hurley failed to respond to the Pro-Se Plaintiff within a thirty day period. On July 14, 2016, I received The Defendant's First Set of Interrogatories and First Set of Request for Production to Plaintiff from Sarah Day Hurley which I answered within thirty days in accordance with Rules 26 and 33(b) of the South Carolina Rules of Civil Procedure. There are two law firms that I have submitted documentation for separately in accordance to the rules. The attorney Mr. Michael Montgomery asked for an extension and made a plea on behalf for both defendants on the same day the Plaintiff was required to produce A First Set of Request for Production to Defendant and First Set of Continuing Interrogatories to Defendant from Sarah Day Hurley. The behavior for both attorney's is unprofessional and deceitful and should be punished accordingly. Aminah A. Richburg the Plaintiff continues to suffer lost earnings, humiliation, mental suffering and embarrassment. The attorneys are causing the Plaintiff more pain and suffering through their unprofessional performance and approach to this case. Whatever is required by the court, mediation or hearing, I am requesting that it take place accordingly.

Hearing Requested by: Aminah A. Richburg (Pro Se) Date: August 1, 2016

For: ☑ Plaintiff ☐ Defendant

*****Section below to be completed by Clerk of Court.******

The hearing in this matter is scheduled for _____day of _____20_____at_____(time)

☐ a.m./ ☐ p.m., Courtroom_____, before the Honorable_____for_____(length of time).

SCCA 410 (12/2009)

Appellate Motion of September 16, 2016

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE AMINAH A. RICHBURG Plaintiff vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE Defendants	IN THE COURT OF COMMON PLEAS Docket No. : 2016-CP-23-02113 **REQUEST / MOTION FOR COURT OF COMMON PLEAS TO DISSOLVE, TERMINATE, CANCEL DEFENDANTS MOTION FOR PROTECTIVE ORDER AND STIPULATION FOR PROTECTIVE ORDER AND ORDER THEREON**

Plaintiff's Attorney: Pro Se Aminah A. Richburg

Mailing Address: 217 Plum Creek Lane Greenville, SC 29607

Telephone: 864-419-6707

Email: richburga@bellsouth.net

Defendants' Attorney: Michael Montgomery

Mailing Address P.O. Box 11449 Columbia, SC 29211

Telephone:

Email:

Defendants' Attorney: Sarah Day Hurley

Mailing Address: Post Office Box 1509 Greenville, SC 29602

Telephone: 864-552-4651 Fax: 864-282-5965

Email:

Type of Hearing: No Hearing Required

Time Needed: None

Dates and Times Unavailable: I (Aminah A. Richburg) work for Greenville County Schools and will be unavailable when I am under contract beginning August 9, 2016 Through June 6, 2017 from 7:45 am to 3:30 pm. Special arrangements will be necessary for me to leave work early for proposed court time beginning at 3:00 until 5:00 from my building principal.

Comments and Issues: The Defendants and their Attorneys have engaged in wrongful conduct. I submitted A First Set of Request for Production to Defendant and First Set of Continuing Interrogatories to Defendants on June 20, 2016 and both Michael Montgomery and Sarah Day Hurley failed to respond to the Pro-Se Plaintiff

within a thirty day period. On July 14, 2016, I received The Defendant's First Set of Interrogatories and First Set of Request for Production to Plaintiff from Sarah Day Hurley which I answered within thirty days in accordance with Rules 26 and 33(b) of the South Carolina Rules of Civil Procedure. There are two law firms that I have submitted documentation for separately in accordance to the rules. The attorney Mr. Michael Montgomery asked for an extension and made a plea on behalf for both defendants on the same day the Plaintiff was required to produce A First Set of Request for Production to Defendant and First Set of Continuing Interrogatories to Defendant from Sarah Day Hurley. The behavior for both attorney's is unprofessional and deceitful and should be punished accordingly. Aminah A. Richburg the Plaintiff continues to suffer lost earnings, humiliation, mental suffering and embarrassment. The attorneys are causing the Plaintiff more pain and suffering through their unprofessional performance and approach to this case. The Plaintiff received The Defendant's, South Carolina High School League's Responses to Plaintiff's First Set of Continuing Interrogatories and Defendant's South Carolina High School League's Responses to Plaintiff's First Set of Request for Production from Sowell Gray Stepp & Laffitte on August 29, 2016. On September 7, 2016, the Plaintiff received the Defendant's Answers to Plaintiff's First Set of Continuing Interrogatories and Defendant's Responses to Plaintiff's First Set of Request for Production from Turner Padget Graham and Laney P.A. Both law firms sent all documents unprofessionally late and the Sowell and Gray sent a copy of a Stipulation For Protective Order and Order Thereon for me to sign and return on September 12, 2016. The Defendants along with Turner Padget Graham & Laney P.A. and Sowell Gray Stepp & Laffitte, LLC failed to send the majority information requested in the Plainitff's First Set of Continuing Interrogatories or Responses to Plaintiff's First Set of Request for Production by the Plaintiff. A majority of the documents sent by both law practices are ineligible, illegitimate and hard to decipher, the print quality is so bad the documents sent are burdensome to read and the behavior of both law practices seem amateurish and bungling in their approach to this Civil Action. The Plaintiff Aminah A. Richburg solemnly request to the Judge assigned for the proposed hearing dissolve, terminate and cancel the submission of the Stipulation for Protective Order and Order Thereon and the Notice of Motion and Motion for Protective Order. Sarah Hurley representing Turner Padget Graham & Laney P.A. did not initiate the Stipulation For Protective Order and Order Thereon Notice of Motion and Motion For Protective Order, it was created by Michael Montgomery of Sowell and Gray. Unfortunately, Ms. Hurley has communicated with the Non-Jury Coordinator Greenville County Clerk of Court on matters she did not initiate on matters of when the Motion would be heard by a judge. It is my hope that the judge will evaluate the specific circumstances of Civil Action No. 2016-CP-23-02113 that support the termination of the motion through the General Allegations in the Complaint by the Plaintiff, and For A First Cause of Action (Defamation) 13, 14 15a, 15b, 15c, 15d, 15e, 15f, 15g, 15h, 15i, 15j, 15k, 15l, 15m, communicated in the Complaint. The Plaintiff Aminah A. Richburg does not agree with any part of the Stipulation for Protective Order and Order Thereon as well as the Notice of Motion and Motion for Protective Order and believes that it must be dissolved, terminated and canceled to protect the interests of the Plaintiff. The SCHSL determined that if there is any intent of the Plaintiff to apply for future membership in SCBOA District One, the application WILL NOT be accepted, therefore, the Plaintiff will not officiate basketball for the SCHSL District One SCBOA, so the disclosure of information will not affect any future relationships between schools and officials. The South Carolina High School League is subject to the Freedom of Information Act and it is required to make public all affairs for review. The SCHSL is not a state agency or other government entity and the SCHSL cannot prevent disclosure of any of its affairs or business operations in the State of South Carolina as communicated by governmental leaders in the State of South Carolina. The information requested by the Plaintiff is discoverable by right and the Plaintiff can share all information with anyone outside of the parties to the present lawsuit to ensure that what the Plaintiff has experienced with the SCHSL & SCBOA District One termination of her membership will not happen again to any other official with similar circumstances. The Plaintiff believes she should be allowed to share her information with the South Carolina SCHSL Public Liaison Advisory Committee if one exists and if not share with the supervisory committee, government leaders in the state of South Carolina or any person that exists to hold the leaders of the SCHSL accountable and assist them in developing procedures to protect

officials that provide services for the SCHSL and if needed, legislation will be recommended to ensure that the SCHSL leadership abides by its constitution, by-laws and any other requirements set by Government leaders and departments in the State of South Carolina. The SCHSL with the motion through the help of the court will remove any accountability and transparency that is required through its organization's day to day operations. The SCHSL is attempting impose control through a protective order through the court system and the motion must be dissolved, terminated and canceled.

Motion Requested by: Aminah A. Richburg (Pro Se) Date: September 16, 2016

For: ☑ Plaintiff ☐ Defendant

Section below to be completed by Clerk of Court.*

The hearing in this matter is scheduled for _____day of _____20_____,at_____(time)

☐ a.m./ ☐ p.m., Courtroom_____, before the Honorable_____for_____(length of time).

SCCA 410 (12/2009)

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	Civil Action No. 2016-CP-23-02113
Plaintiff	)	
	)	
vs.	)	
E.A. "RICO" WILLIAMS, DIRECTOR	)	NOTICE OF MOTION TO COMPEL
DISTRICT ONE SC BASKETBALL	)	
OFFICIALS ASSOCIATION AND THE	)	
SOUTH CAROLINA HIGH SCHOOL	)	
LEAGUE	)	
	)	
Defendants	)	

TO: Sarah Day Hurley, Esquire attorney for E.A. Rico Williams and J. Michael Montgomery attorney for the South Carolina High School League:

YOU WILL PLEASE TAKE NOTICE that Aminah A. Richburg, Pro Se Plaintiff, before this court that a hearing date to be set to address this notice and motion to compel discovery. The Plaintiff was present before Honorable Roger L. Couch the Presiding Judge of the Greenville County Court of Common Pleas on September 20, 2016 seeking clarity on South Carolina Rules of Civil Procedures based on document transactions between the Plaintiff and the Defendants. The Honorable Roger L. Couch communicated that he would make no ruling on any documentation presented during the hearing, for it was not for the Judge to respond. The Presiding Judge found no wrong doing in document exchange according to the South Carolina Rules of Civil Procedure due to communication failures with the Defendants and the Plaintiff and admonished the Plaintiff to check all forms of communication due to the nature of this case. The Honorable Roger L. Couch, presiding judge communicated that the Plaintiff on the specific matter of discovery, could file a motion to compel, stating and clarifying discovery sought and addressing objections made by defendants. The Plaintiff must state what the Plaintiff is seeking and why the information should be made to the Plaintiff.

The Plaintiff hereby seeks a Motion to Compel to acquire the information and documents requested according to DEFINITIONS on June 20, 2016 through; Plaintiff, Aminah A. Richburg First Set of Continuing Interrogatories To Defendant and Plaintiff, Aminah A. Richburg First Set of Request for Production to Defendant. The Defendant E.A. "Rico" Williams/ Sarah Day Hurley, Esquire attorney and the Defendant, South Carolina High School League (SCHSL)/ J. Michael Montgomery attorney responded to Plaintiff and failed with several responses to meet the definitions listed below. The Defendant E.A. "Rico" Williams/ Sarah Day Hurley, Esquire attorney and the Defendant, South Carolina High School League (SCHSL)/ J. Michael Montgomery also communicated the same objections to the interrogatories listed after responses First Set of Request for Production to Defendant.

DEFINITIONS

The following definitions apply to these Requests:

A. The terms "you" and "your" when used herein refer to the Defendants above named.
B. The term "identify" when used herein in connection with natural persons means to state their full name, title, and job description, if applicable, and their present business and resident addresses (this term applies to all individuals).
C. The term "identify" when used in connection with business entities means to state the business name and present address of each said entity.
D. When the Request ask for a description or identification of a document, the response shall be given in sufficient detail to enable a party or person to whom a subpoena or request to produce documents is

directly to identify fully the document sought to be produced and to enable counsel for the plaintiff Aminah A. Richburg Pro Se to determine that such documents, when produced, are in fact the documents so described.

E. The term "document" when used herein, means all original writing of any nature or kind whatsoever and all identical copies thereof, in your possession, custody or control regardless of where located, and all other documents of which you have knowledge and includes, but is not limited to, correspondence, diagrams, or other written communications, data processing storage units, tapes, contracts, agreements, notes, schedules, summaries, compilations, analysis, memoranda, indices, work papers, studies, surveys, internal and external reports, diaries, calendars, films, photographs, minutes of meetings, invoices, receipts, bills, orders, confirmations, bills of lading, delivery receipts, and other documents as identified in Rule 34 of the South Carolina Rules of Civil Procedure. In all cases where original and/or non-identical copies are available, "documents" also means copies thereof.

INTERROGATORIES

1. Give the names and address of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

a. *Aminah A. Richburg*
   217 Plum Creek Lane
   Greenville, South Carolina 29607
   No written or recorded statement has been provided.
   Ms. Richburg is the plaintiff and is expected to testify as to the circumstances the incident that is the subject of this matter.

b. *Rico Williams*
   Address unkown
   No written or recorded statement has been provided.
   Mr. Williams is the director for District One of the SC Basketball Officials Association and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

c. *Skp Lax*
   c/o undersigned counsel
   No written or recorded statement has been provided.
   Mr. Lax is employed by the South Carolina High School League and is expected to testify as to his communication with the plaintiff regarding the incident that is the subject of this matter.

d. *Members of the District One Board of Directors*
   (names unknown)
   No written or recorded statements have been provided.
   Members of the District One Board of Directors are expected to testify as to the reason for any decisions regarding plaintiff's future application for membership.

e. *The defendant, SCHSL, reserves the right to identify other witnesses whose names become known during the course of discovery.*

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601

a. Aminah A. Richburg
217 Plum Creek Lane
Greenville, South Carolina 29607
No written or recorded statement has been provided.
Ms. Richburg is the plaintiff and is expected to testify as to the circumstances the incident that is the subject of this matter.

b. Rico Williams
1 Ridgeside Court
Greenville, SC 29617
Mr. Williams may be contacted through his undersigned counsel
No written or recorded statement has been provided.
Mr. Williams is the director for District One of the SC Basketball Officials Association and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

c. Skip Lax
[address unknown]
No written or recorded statement has been provided.
Mr. Lax is employed by the South Carolina High School League and is expected to testify as to his communication with the plaintiff regarding the incident that is the subject of this matter.

d. Members of the District One Board of Directors
(names to be provided)
No written or recorded statements have been provided.
Members of the District One Board of Directors are expected to testify as to the reason for any decisions regarding plaintiff's future application for membership.

e. This Defendant, reserves the right to identify other witnesses whose names become known during the course of discovery.

- Plaintiff- Why Information/Documentation Sought
  The first and last names of the District One Board of Directors not revealed.

2. Supply the following information with respect to each individual whose name you have given in the response to the preceding Interrogatory:
   a. Location or locations where any such statements were made;
   b. The identity of the person or persons in whose presence such statement or statements were made;
   c. The time and date upon which such statements were made; and
   d. A summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

   Not applicable, as the defendant is not in possession of any written or recorded statements.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Not applicable, as Defendant is not in possession of any written or recorded statements.

- **Plaintiff- Why Information/Documentation Sought**
  Information Accepted

3. Set forth a list of photographs, plats, sketches, or other prepared documents in possession of the party that relate to the claim or defense in the case.
   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
   The defendant, SCHSL, is in possession of the following:
   a. *Sample officials application which includes the Code of Ethics for all officials (Bates labeled 001-002)*
   b. *Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.*
   c. *Email correspondence received by Skip Lax on February5, 2016 (Bates labeled 012-013)*
   d. *Email correspondence between Skip Lax and Aminah Richburg on February 9-11,2016 (Bates labeled 014-018.*
   e. *Email correspondence received by Skip Lax on March 14, 2016 (Bates labeled 019-020)*
   f. *Email correspondence received by Skip Lax on March 21, 2016 (Bates labeled 021)*
   g. *Ratings for all basketball officials for 2014-2015 and 2015-2016 (Bates labeled 022-036)*
   h. *List of basketball and football officials for District One (Bates labeled 037-044)*
   RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
   a. SCBOA District 1 Contracts with Plaintiff for 2014 and 2015;
   b. Code of Ethics for the South Carolina Basketball Officials Association;
   c. February 5, 2016 email from Rico Williams to Aminah Richburg;
   d. February 22, 2016 email from Joedy Moots to Aminah Richburg;
   e. March 14, 2016 emails 9two0 from Rich Williams to: Skip Lax, Jerome Singleton, and Joedy Moots;
   f. March 21, 2016 email from Rico Williams to Aminah Richburg, with copies to Jerome Singleton, Skip Lax, Joedy Moots, and District One Board members;
   g. SCBOA District One Board meeting minutes from February 29, 2016.

   - Plaintiff- Why Information/Documentation Sought

   b. Sowell Gray Stepp & Laffitte, LLC, Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.

The Plaintiff has never officiated an official varsity basketball game with pay from 2013-2016. The Defendant indicates, therefore the names of schools that blocked the Plaintiff through the Arbiter program must be provided and the protective order must be dismissed. The Defendants failed to send varsity scrimmages for 2013. Documents needed to support the Defendant's allegation.

The Plaintiff served as a (U2-Lower Ranking Official) on 11/18/2014 at a required scrimmage (not an official game) with no payment at Greenville High School (Home), Byrnes HS - Visitor, Palmetto HS - Visitor with three officials, Lateef Muhammad (Referee), John Williams (U1), Charles A. Edens (U1) and Sean O'Connell (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/20/2014 at a required scrimmage (not an official game) with no payment at Easley High School (Home), Powdersville HS - Visitor, with three officials, Gordon Greer (Referee), No Name Provided Arbiter (U1), Anthony L. McDavid (U2) and No Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/22/2014 at a required scrimmage (not an official game) with no payment at Carolina High School (Home), Christ Church HS - Visitor, with two officials, David C. Kirk (Referee), No Name Provided Arbiter (U2), No Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U1-Lower Ranking Official) on 12/2/2014 at a required scrimmage (not an official game) with no payment at

Pleasant Grove BC Greer (Home), Greenville Hurricanes HS - Visitor, Brashier Middle College, with one official, Ray Martin (Referee). The Plaintiff was required to officiate the high school scrimmage for the entire game. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/10/2015 at a required scrimmage (not an official game) with no payment at Hillcrest High School (Home), and Greer HS – Visitor, with three officials, David C. Kirk (Referee), Audrey Cox (U1), John Williams (U2) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/17/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three officials, E. A. Williams (Referee), Steward Lawrence (U1), Jim Geyer (U1) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/19/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three officials, Steward Lawrence (Referee), Jay Ratterree (U1), Jermaine Counts (U2) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The defendant must provide the names of schools and officials that blocked the Plaintiff for Varsity contest and the dates and times the blocks were made in the system

4. Identify every witness known to you or to your attorney who claim to have seen or heard the Plaintiff through its agents, servants, or employees, make any statement or statements pertaining to any of the events or happenings alleged in the Defendant's answer or in the Complaint, as well as a description of those statements.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, would refer to the email correspondence provided by Rico Williams, which is referenced above.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant would refer Plaintiff to the emails produced herewith. In addition, Defendant would refer Plaintiff to the minutes of the SCBOA Board meeting on February 29, 2016 and the list of the Board members in attendance at that meeting.

- Plaintiff- Why Information/Documentation Sought
  A detailed list of first and last names of Board members not provided.
  A detailed list of first and last names of Board members at the meeting on Februray 29, 2016 not provided. (Williams 00017)
  A detailed list with first and last names of all persons contacted with emails on behalf of the Plaintiff not provided. The Plaintiff seeks the names of all Board Members that contract and solicit basketball officiating services to various organizations including YBOA in the Upstate besides E.A. Rico Williams.

  The Plaintiff seeks all correspondence between Joedy Moots (Officials Representative, South Carolina High School League) and E.A. Rico Williams. The Plaintiff sought the assistance of the (Officials Representative) Joedy Moots in confidence and Mr. Joedy Moots shared the communication with Mr. E.A. Williams and the Plaintiff would like to know why it was done and a copy of the policy that supports organization marginality with the behavior of Mr. Moots. (Williams 00017).
  The Defendant must provide all information/documents discussed during the SCBOA Board meeting on February 29, 2016, especially the Officials Representative Response read during the meeting. (Williams 00017).
  Aminah Richburg
  -Wrote SCBOA Official's Representative
  -SCBOA Officials Representative Response Read – What SCBOA Officials Representative Response Read? The Plaintiff request what documents that were shared during the meeting
  Reviewed District Facts – The Defendant must provide all reviewed district facts
  The Defendant must provide all ratings from other partners as well as the Plaintiffs rating with her partners from 2013-2016.

The Plaintiff request the actual vote for all Board Members listing first and last names (Williams 00017). The tally presented has been tampered and does not appear to be valid nor its interpretation. The Plaintiff completed her third year as an official in February of 2016.The Plaintiff also request the minutes of this meeting.

5. Please provide a copy of all sign in sheets or attendance sheets with arrival times for all members attending meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, does not keep or maintain sign-in sheets or attendance sheets for meetings of the District One Basketball Officials Association, and it would refer to the defendant, Rico Williams, for any documents that may be responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff - Why Information/Documentation Sought
The Defendant did not provide the requested documents for sign in sheets or attendance sheets with arrival times for all members attending meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years. The Defendant communicated the importance of arrival times for all meetings attended by members of the SCBOA and those conducted by the South Carolina High School League, therefore the Defendant must provide the requested documents

Every SCBOA District One meeting the Plaintiff has attended as a Basketball official for the past three years, all officials are credited for attendance at roll call at the conclusion of the meeting. The Plaintiff has attended basketball officials meetings conducted by The South Carolina High School League and all that is required for attendance is a signature or check performed by the district director before the conclusion of the meeting. The same practice continues to be observed by the Plaintiff for Football Officials, Softball Officials, Volleyball Officials and Lacrosse Officials. The Defendant E.A. Rico Williams created the meeting arrival times of the Plaintiff and communicated them in his email to South Carolina High School League to support his personal agenda to suspend the membership of the Plaintiff. The Defendant must provide the sign in sheets with arrival times for all members for the past five (5) years.

6. Please provide a copy of all basketball officials that were assigned games with the Plaintiff for the past three (3) years under District One South Carolina Basketball Officials Association and the South Carolina High School League.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, does not maintain records of other officials that would have been assigned games with the plaintiff directly from the SCHSL for varsity sports through Arbiter. The defendant, SCHSL, would refer to the defendant, Rico Williams, for any documents he may have regarding sub-varsity contest that would have been assigned at the district level.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff- Why Information/Documentation Sought

The Defendant failed to send records of all prior scrimmages in 2013 (Williams 00022-00032). The Defendant failed to supply the names of basketball officials assigned games with the plaintiff
(Williams 00022-00032) , Game 12805- Referee 1/6/2014,12536-Referee 1/21/2014, 13092 (U2) 6/26/2014, 13093 (U2) 13093 6/26/2014, 13094 (U2) 6/26/2014, 13378 11/13/14 (U1), Observer, 15044- 11/20/2014 (U2), (U2), 15064-11/22/14 (U1),(U2).

7. Please provide a copy of all the school assignments for basketball games for the Plaintiff under the South Carolina High School League through District One South Carolina Basketball Officials association for the past three (3) years.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, is only in possession of assignemnts for varsity basketball contest in 2014-2015 or 2015-2016. The defendant, SCHSL, would refer to the defendant, Rico Williams, for any documents he may have regarding sub-varsity contest that would have been assigned at the district level.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff- Why Information/Documentation Sought
- Defendant failed to provide scrimmages for 2013-2014 season. Plaintiff request time limit for documents kept in the ordinary course of business to be applied the time limit must be relevant as well.

8. The Defendant E.A. "Rico" Williams must provide a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
Not Applicable

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff- Why Information/Documentation Sought

The Defendant failed to send a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years.
The Plaintiff would require the Defendant to provide the first and last names of the basketball officials that were assigned games with the Plaintiff assigned by E.A."Rico" Williams.

- The Plaintiff was assigned games by E.A. "Rico" Williams through his business with members of the SCBOA District One that are sub-Varsity/Varsity officials. The Plaintiff's continuously received assignments with E.A. "Rico" Williams for his business and the first communication sent by the Defendant supports the requirement for this information and documentation. (Williams 0004) Plaintiff request time limit for documents kept in the ordinary course of business to be applied the time limit must be relevant as well.

9. The Defendant E.A. "Rico" Williams must provide list all of officials assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past (3) years.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
Not Applicable

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff- Why Information/Documentation Sought
- The Defendant E.A. "Rico" Williams failed to provide a list of all of the officials he assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past (3) years. Plaintiff request time limit for documents kept in the ordinary course of business to be applied the time limit must be relevant as well.

10. Please provide the identity of the "Someone" communicated in the email sent by E.A. Rico Williams on Friday, February 5, 2016 at 1:49 pm to the Plaintiff, Skip Lax and others that received the message on behalf of the Plaintiff.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, does not know the identity of the person in question.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
John Williams

- **Plaintiff- Why Information/Documentation Sought**
- **The Defendant must provide all ratings from John Williams from 2013-2016.**
- **The Defendant must provide the Plaintiffs rating with John Williams from 2013-2016.**

11. Provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico" Williams on February 5, 2016 at 1:49 pm.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, does not know the background, names, and affiliations of all the recipients of the email in question. The defendant, SCHSL, is only aware that several of the recipients – albanister77@gmail.com; audrex.cox94@yahoo.com; hullingerge@yahoo.com; and ken@kenpelanda.com – are current or former officials.
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this request on the grounds that it is overly broad, and also vague to the extent it seeks the "affiliations" of such individuals. Subject to and without waiving this objection, Defendant will supplement this response with a list of the SCBOA Board members and their addresses, to the extent known.

- **Plaintiff- Why Information/Documentation Sought**
  The Defendant has failed to provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico Williams on February 5, 2016. (Williams 0004)

12. Provide documentation of the communication and/or summary of the communications for records requested by Bob Wnukowski and Kevin Brown on behalf of the Plaintiff from E.A. "Rico" Williams.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, did not request records and therefore is not in possession of documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant is not in possession of any documentation responsive to this request. All communications were by telephone.

- **Plaintiff -Why Information/Documentation Sought**
  Documentation presented (Williams 00015 – Dated and Signed on 8/26/16) – Communication Bob Wnukowski and Kevin Brown. (Williams-00017)Cites – Reviewed District Facts – Documentation communicated, the Defendants must provide documentation.

13. Provide documentation of all schools that blocked the Plaintiff and the Schools the Plaintiff blocked for South Carolina High School League/ SCBOA District One officiating services for all sports for District One.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, is in possession of the names of schools that blocked the plaintiff through the Arbiter software, which would only apply to varsity contest for the SCHSL. Due to the sensitive and private nature of the request, the defendant, SCHSL, will provide this information upon entry of a Protective Order.
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

- **Why Information/Documentation Sought**
  The Plaintiff alleges that the Defendants conduct in this matter is wrongful and they are guilty of defamation, malice, negligence and/or recklessness. The Plaintiff was a member of SCBOA District 1 for the 2015-16 season and received middle school girls and boys assignments beginning December 2, 2015 at League Academy, December 3, 2015 at Mauldin Middle School, December 10, 2015 at Bryson Middle School, December 11, 2015 at Eastside High School, December 14, 2015 at Tanglewood Middle School, December 17 at Sevier Middle School, January 7, 2016 at Greer Middle School, January 8, 2016 at Southside Christian School, January 13, 2016 at Sevier Middle School, 1/26/2016 at Welcome Baptist Church, 1/29/2016 at Dacusville Middle School, February 1, 2016 at Beck Academy and the final game on 2/6/2016 at Tanglewood Middle School. The assignments reflect the same schools the Plaintiff has been assigned since 2013. The documentation received from the Defendants (Williams 00020), do not reflect what was communicated by E.A. Rico Williams concerning schools that blocked the Plaintiff and the schools the Plaintiff blocked.
  There are two dates that were blocked by Robert (Bob) Wnukowski, (January 4, 2016 and January 21,2016) the Plaintiff would like to know how and why because

the Plaintiff sets her own blocks and had no need for Robert (Bob) Wnukowski to set blocks in Arbiter. The discrepancies apparent in the documentation labeled 0018-0032 support the Plaintiff's claims in her complaint, therefore the Motion to compel must be granted. Defendants must provide day, time and year of the blocks reported in the Arbiter System or any other records communicated.

14. Provide a listing of all basketball officials in South Carolina High School League/SCBOA District One that officiate football and volleyball.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
Please see the attached list

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a search of the SCBOA District One records and supplement this response to the extent such information may be obtained.

- Why Information/Documentation Sought
The Defendant failed to produce a document listing basketball officials in South Carolina High School League/SCBOA District One that officiate football and volleyball.
The Defendant created unofficial (0014 Williams), list Crotts, Michael, Edwards, Mack, Elmer, Joe, Greer, Gordon, Richburg, Aminah, Wunkowski, Bob for Interrogatories 14. The discrepancies in the documentation supports the need for Motion to Compel to be granted.

15. Provide documentation of South Carolina High School League/ SCBOA District One Board Meeting minutes and sign in sheets with member arrival times from 2013-2016.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, does not keep or maintain sign-in sheets or attendance sheets for meetings of the District One Basketball Officials Association, and it would refer to the defendant, Rico Williams, for any documents that may be responsive to this Request.
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this Interrogatory to the extent it seeks information beyond the issues and claims in this case. Subject to this objection, Defendant will produce any minutes of the February 29, 2016 of the SCBOA Board meeting, as well as the sign-in sheets for the SCBOA District One meetings to the extent such information may be obtained.

- Plaintiff- Why Information/Documentation Sought
- Defendant failed to provide South Carolina High School League/ SCBOA District One Board Meeting minutes and sign in sheets with member arrival times from 2013-2016.

- A detailed list of first and last names of Board members attending the meeting with arrival times at the meeting on Februray 29, 2016 not provided. (Williams 00017)
- The Plaintiff seeks the names of all Board Members that contract and solicit basketball officiating services to various organizations including the YBOA in the Upstate besides E.A. Rico Williams.
- The Defendant communicated the importance of arrival times for all meetings attended by members of the SCBOA and those conducted by the South Carolina High School League, therefore the Defendant must provide the requested documents. (Williams 00005)
- Plaintiff request time limit for documents kept in the ordinary course of business to be applied the time limit must be relevant as well.

16. Provide the documentation of the South Carolina High School League/ SCBOA District One Board Members present for the meeting on February 29, 2016 along with arrival times including the members individual vote/ termination for the Plaintiff.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, was not involved in this meeting and no one from its office attended the meeting on February 29, 2016. Therefore, it does not have any documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will supplement this response upon receipt of the meeting minutes, from which the information sought may be obtained.

- Plaintiff- Why Information/Documentation Sought
- Documentation of the South Carolina High School League/SCBOA District One Board Members first and last name present for the meeting on February 29, 2016 along with arrival times not provided.
- The Defendant communicated the importance of arrival times for all meetings attended by members of the SCBOA and those conducted by the South Carolina High School League, therefore the Defendant must provide the requested documents. (Williams 00005)

- Documentation reflecting member's individual vote with first and last names indicating the vote to terminate the Plaintiff's membership was not provided or the reasons for the Plaintiff's termination.

- The Plaintiff seeks all correspondence between Joedy Moots (Officials Representative, South Carolina High School League) and E.A. Rico Williams. The Plaintiff sought the assistance of the (Officials Representative) Joedy Moots in confidence and Mr. Joedy Moots shared the communication with Mr. E.A. Williams and the Plaintiff would like to know why it was done and a copy of the policy that supports organization marginality with the behavior of Mr. Moots. (Williams 00017).
- The Defendant must provide all information/documents discussed during the SCBOA Board meeting on February 29, 2016, especially the Officials Representative Response read during the meeting. (Williams 00017).
- Aminah Richburg
- -Wrote SCBOA Official's Representative
- -SCBOA Officials Representative Response Read – What SCBOA Officials Representative Response Read? The Defendant must communicate what document was shared during the meeting
- Reviewed District Facts – The Defendant must provide all reviewed district facts
- The Defendant must provide all ratings from other partners as well as the Plaintiffs rating with her partners from 2013-2016.
- Plaintiff request time limit for documents kept in the ordinary course of business to be applied.

17. Provide documentation of all ten officials communicated by E.A. "Rico" Williams that blocked the Plaintiff in the South Carolina High School League/ SCBOA District One.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, is in possession of the names of officials that blocked the plaintiff through Arbiter software, which would only apply to varsity contests for the SCHSL. Due to the sensitive and private nature of the request, the defendant, SCHSL, will provide this information upon entry of a Protective Order.
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

- Plaintiff- Why Information/Documentation Sought

The Plaintiff has never officiated an official varsity basketball game with pay from 2013-2016. Therefore the names of schools that blocked the Plaintiff through the Arbiter program must be provided and the protective order must be dismissed. The Defendants failed to send varsity scrimmages for 2013.

The Plaintiff served as a (U2-Lower Ranking Official) on 11/18/2014 at a required scrimmage (not an official game) with no payment at Greenville High School (Home), Byrnes HS - Visitor, Palmetto HS - Visitor with three officials, Lateef Muhammad (Referee), John Williams (U1), Charles A. Edens (U1) and Sean O'Connell (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/20/2014 at a required scrimmage (not an official game) with no payment at Easley High School (Home), Powdersville HS - Visitor, with three officials, Gordon Greer (Referee), No Name Provided Arbiter (U1), Anthony L. McDavid (U2) and No Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/22/2014 at a required scrimmage (not an official game) with no payment at Carolina High School (Home), Christ Church HS - Visitor, with two officials, David C. Kirk (Referee), No Name Provided Arbiter (U2), No Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U1-Lower Ranking Official) on 12/2/2014 at a required scrimmage (not an official game) with no payment at Pleasant Grove BC Greer (Home), Greenville Hurricanes HS - Visitor, Brashier Middle College, with one official, Ray Martin (Referee). The Plaintiff was required to officiate the high school scrimmage for the entire game. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/10/2015 at a required scrimmage (not an official game) with no payment at Hillcrest High School (Home), and Greer HS – Visitor, with three officials, David C. Kirk (Referee), Audrey Cox (U1), John Williams (U2) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/17/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three

officials, E. A. Williams (Referee), Steward Lawrence (U1), Jim Geyer (U1) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/19/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three officials, Steward Lawrence (Referee), Jay Ratterree (U1), Jermaine Counts (U2) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The defendant must provide the names of schools and officials that blocked the Plaintiff for Varsity contest and the dates and times the blocks were made in the system.

18. Provide all fee's collected by the South Carolina High School League for every coach ejected from a game and penalized financially from 2013-2016.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, objects to this Interrogatory on the grounds that it is overbroad, irrelevant, ant not calculated to lead to the discovery of admissible evidence. Not waiving this objection, The South Carolina High School League has not calculated the total number of fes collected, but it would repond that there were thirty-three (33) basketball coach ejections from 2013-2016, and the fines for ejections range from $100-$500.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
This Defendant is not in possession of the information sought.

- Plaintiff- Why Information/Documentation Sought
  The South Carolina High School League reprimands and fines all that participate in Scholastic sports in the State of South Carolina since its existence. The SCHSL must be held to the very same principles it upholds with its organizational practices when maleficence has occurred.

19. Identify each and every person whom you have retained as an expert, identify:
    a. The subject matter of the expert's anticipated testimony;
    b. The substance of the facts and opinions upon which the expert is expected to testify;
    c. A summary of the grounds for each opinion to which the expert is expected to testify
    d. The educational background and qualifications of the expert; and
    e. Whether, and how many times, the expert has previously testified as an expert in a court of law.
    RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

The defendant, SCHSL, has not retained an expert but will supplement this Response should an expert be retained.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601

Defendant has not retained an expert but will supplement this Response should an expert be retained to testify at trial.

- Plaintiff- Why Information/Documentation Sought
  Response Accepted

REQUEST FOR PRODUCTION

1. Please produce all statements or any other written or printed documents relating to the claim set forth in the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

a. *Sample officials application which includes the Code of Ethics for all officials (Bates labeled 001-002)*
b. *Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.*
c. *Email correspondence received by Skip Lax on February5, 2016 (Bates labeled 012-013)*
d. *Email correspondence between Skip Lax and Aminah Richburg on February 9-11,2016 (Bates labeled 014-018.*
e. *Email correspondence received by Skip Lax on March 14, 2016 (Bates labeled 019-020)*
f. *Email correspondence received by Skip Lax on March 21, 2016 (Bates labeled 021)*
g. *Ratings for all basketball officials for 2014-2015 and 2015-2016 (Bates labeled 022-036)*
h. *List of basketball and football officials for District One (Bates labeled 037-044)*

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601

a. SCBOA District 1 Contracts with Plaintiff for 2014 and 2015;
b. Code of Ethics for the South Carolina Basketball Officials Association;
c. February 5; 2016 email from Rico Williams to Aminah Richburg;
d. February 22, 2016 email from Joedy Moots to Aminah Richburg;
e. March 14, 2016 emails 9two0 from Rich Williams to: Skip Lax, Jerome Singleton, and Joedy Moots;
f. March 21, 2016 email from Rico Williams to Aminah Richburg, with copies to Jerome Singleton, Skip Lax, Joedy Moots, and District One Board members;
g. SCBOA District One Board meeting minutes from February 29, 2016.

- Plaintiff- Why Information/Documentation Sought
  Information Accepted

2. Please produce all photographs, diagrams, drawings, videocassettes, audiocassettes, or other similar material set forth in the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, is not in possession of documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
See documents produced herewith.

- **Plaintiff- Why Information/Documentation Sought**

The Plaintiff needs clarity with the communication from the Defendant – See documents herewith.

3. Please produce all statements of possible witnesses, whether written, oral, summarized, or otherwise produced in any manner, set forth in the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, is not in possession of documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant is not in possession of any witness statements.

- **Plaintiff- Why Information/Documentation Sought**
- **Information Accepted**

4. Please produce all tax returns of the Defendants. Both Federal and State returns, for the five (5) years preceding the incident set forth in the Defendants answer to the Plaintiff's Complaint as well as any returns made subsequent to the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, objects to this Interrogatory on the grounds that it is overbroad, irrelevant, and not calculated to lead to the discovery of admissible evidence.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this Request on the grounds the information sought is not relevant to any claim or defense in this action, and is not reasonably calculated to lead to the discovery of admissible evidence.

- **Plaintiff- Why Information/Documentation Sought**

The Defendants operate businesses in the State of South Carolina and are entrusted to operate their businesses with integrity therefore they are subject to transparency.

5. Please provide any documents or things not heretofore requested which relate to the Plaintiff's First Set of Continuing Interrogatories, served herewith, or which were relied upon, referred to, or otherwise referenced or consulted in connection with the Defendant's responses to the Plaintiff's First Set of Continuing Interrogatories, served herewith.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
Please see Response to Request No. 1, above.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
See Response to Request No. 1 above.

- Plaintiff- Why Information/Documentation Sought

Information Accepted

6. Please provide any other documents or materials which you intend to introduce in the trail of this case.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, would respond that it is premature to determine which documents or materials it will seek to introduce at the trail of this case, and it will supplement this Response following discovery and before trial. Furthermore, the defendant would refer to the items listed in Response to Request No. 1 as documents it may seek to introduce.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant would respond that it is premature to determine which documents or materials he and his counsel will seek to introduce at the trail of this case, and he will supplement this response following discovery and before trial. Furthermore, Defendant would refer Plaintiff to the items listed in Response to Request No. 1 as documents he may seek to introduce.

- Plaintiff- Why Information/Documentation Sought

Information Accepted

7. Please provide copies of any documents received via subpoena or subject to a Freedom of Information Act request relating to the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

Not applicable at this time.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
None at this time.

- **Plaintiff- Why Information/Documentation Sought**

Information Accepted

GENERAL OBJECTIONS

Defendant objects to each Interrogatory to the extent that it seeks information or documents which were compiled in anticipation of litigation for trial and which are protected by the attorney-client, work-product doctrines. This Defendant further objects to each and every Interrogatory to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.

2. Any information produced hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or intending to waive any objections that this Defendant may have with respect to the subsequent use of such information and this defendant respectfully reserves:

a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;
b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, or any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and
c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. Defendant objects to each and every Interrogatory to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this Defendant.
4. Defendant objects to each and every Interrogatory to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This defendant further objects to each and every Interrogatory to the extent it seeks information not limited in time, nature, and scope.
5. Defendant objects to each and every Interrogatory to the extent that it seeks confidential or proprietary information. Similarly, this Defendant reserves the right to redact sensitive or proprietary information from any documents that he produces in response hereunder.
6. Defendant states that his agreement to produce documents responsive to these Interrogatories is to produce any documents in its possession and control, and to the extent which they exist, for inspection in the offices of Turner Padget, 200 East Broad Street, Suite 250, 29601 and Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

Motion Requested by: Aminah A. Richburg (Pro Se) Date: October 11, 2016

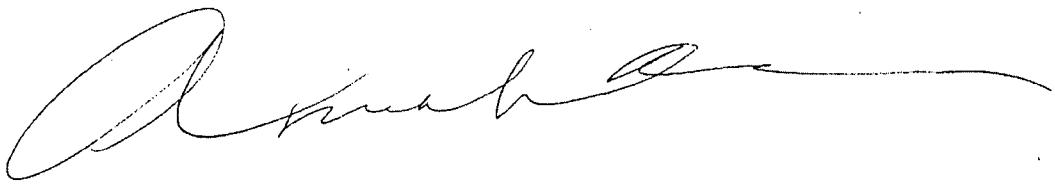
For: ☒ Plaintiff ☐ Defendant

Section below to be completed by Clerk of Court.*

The hearing in this matter is scheduled for _____day of

☐ _____20_____,at_____(time)

a.m./ ☐ p.m., Courtroom_____, before the Honorable_____for_____(length of time).



STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE AMINAH A. RICHBURG Plaintiff vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE Defendants	)	IN THE COURT OF COMMON PLEAS Docket No. : 2016-CP-23-02113 REQUEST/MOTION FOR COURT OF COMMON COMMON PLEAS TO REVERSE ORDER FOR PROTECTIVE ORDER INCLUDING A HEARING REQUEST TO ADDRESS NOTICE OF MOTION TO COMPEL FOR 1ST AND 2ND SET OF CONTINUING INTERROGATOIRES TO DEFENDANT

... CO. S.C.
... NUMBER
2016 DEC 20 AM 11 18

Plaintiff's Attorney: Pro Se Aminah A. Richburg

Mailing Address: 217 Plum Creek Lane Greenville, SC 29607

Telephone: 864-419-6707

Email: richburga@bellsouth.net

Defendants' Attorney: Michael Montgomery

Mailing Address P.O. Box 11449 Columbia, SC 29211

Telephone:

Email:

Defendants' Attorney: Sarah Day Hurley

Mailing Address: Post Office Box 1509 Greenville, SC 29602

Telephone: 864-552-4651 Fax: 864-282-5965

Email:

Type of Hearing: Hearing Required

Time Needed: 2 HOURS

Dates and Times Unavailable: I (Aminah A. Richburg) work for Greenville County Schools and will be unavailable when I am under contract beginning August 9, 2016 Through June 6, 2017 from 7:45 am to 3:30 pm. Special arrangements will be necessary for proposed court time beginning at 4:00 until 5:00 for any hearings in the future on school days. My availability is flexible on non- school days.

This matter came before the court on November 2, 2016, upon the Plaintiff's Request / Motion for Court of Common Pleas to Dissolve, Terminate, Cancel Defendants Motion for Protective Order and Stipulation for Protective Order and Order Thereon along with a Motion to Compel. The Plaintiff, Aminah A. Richburg, was present and proceeded Pro Se. The matter of Protection Order presented by Michael Montgomery, Esq. representing the Defendant, South Carolina High School League and Sarah Day Hurley, Esq. representing the Defendant E.A. Rico Williams. The Honorable Judge Leititia Verdin allowed the Defendant's representatives give background information on the case and later allowed the Plaintiff Pro Se to communicate a timeline of events in the case leading up to the hearing on November 2, 2016. The Honorable Judge Letitia Verdin communicated that she will need a current copy of the Protective Order sent by email by the attorney's representing the Defendants. The Plaintiff asked if she would be afforded an opportunity to submit an Addendum/ Request/ Motion for Court of Common Pleas to Dissolve, Terminate, Cancel Defendants Motion for Protective Order and Stipulation for Protective Order and Order Thereon, the original request was submitted to the court on September 16, 2016 before the first hearing on September 20, 2016 before The Honorable Judge Roger L. Couch. The Honorable Judge Letitia Verdin gave permission for the Plainitff to email the documents and communicated that the Plaintiff must email copies to Michael Montgomery, Esq, and Sarah Day Hurley, Esq .The Honorable Judge Leitita Verdin did not address the Plaintiff's Motion to Compel. The Plaintiff followed the directives communicated by the Honorable Judge Leititia Verdin and informed the opposing counsel of the motion. The Court failed to recognize that the Plaintiff is not afforded the ability to E-file documents and utilized the communication vehicles available to her through regular email transmission. The Honorable Letitia Verdin communicated that she would seek counsel from her law clerk Ian Contis who also serves as a basketball coach at Christ Church Episcopal School due to her unfamiliarity to sports related cases. Two days later he was removed from the case because the Plaintiff's children attend Christ Church Episcopal School and Mr. Contis is familiar with the Plaintiff's children and the Plaintiff has possibly officiated games where he was the acting Coach for the schools boys' basketball team. Marchie Newkirk was appointed replaced Ian Contis and sent documents to the Plaintiff concerning a case with the Greenville Hospital System, the Honorable Judge Letitia Verdin failed to address the qualifications of the new counsel and In the end disrespectfully denied the Plaintiff's Motion to Dissolve, Terminate, Or Cancel Defendant's Motion For A Protective Order without communicating the justification of the order according to Rule 34 of the South Carolina Rules of Civil Procedure and how they are applicable to the South Carolina High School League based on the addendum documentation sent by the Plaintiff. The Plaintiff pleads with the court to reverse the order and hear the Motion to Compel for the 1st and 2nd Set of Interrogatories sent to the Defendant whereas the Plaintiff and Defendant are unable to come to consensus after the exchange and communication of documents presented. The original Motion to Compel was filed on October 11, 2016.

Motion Requested by: Aminah A. Richburg (Pro Se) Date: December 20, 2016

For: ☒ Plaintiff ☐ Defendant

*****Section below to be completed by Clerk of Court.******

The hearing in this matter is scheduled for _____day of _____20_____,at_____(time)

☐ a.m./ ☐ p.m., Courtroom_____, before the Honorable_____for_____(length of time).

Re: 2016-CP-23-02113 Richburg v. Williams/SCHSL

✕ DELETE ← REPLY ↞ REPLY ALL → FORWARD ...

Richburg, Aminah
Tue 11/22/2016 9:07 AM

Mark as unread

To: Michael Montgomery <mmontgomery@sowellgray.com>;

1 attachment

No Protecti~.doc

Download all

I sent the following document to Judge Verdin, I was instructed to send a copy to you as well. I am off work tomorrow, we can talk tomorrow if you are available.

Aminah A. Richburg Ed.D
Physical Education Teacher
Hillcrest Middle School
864-355-6179

From: Michael Montgomery <mmontgomery@sowellgray.com>
Sent: Thursday, November 3, 2016 2:41 PM
To: lverdinlc@sccourts.org
Cc: aminah richburg; Richburg, Aminah; Hurley, Sarah D.
Subject: 2016-CP-23-02113 Richburg v. Williams/SCHSL

Good afternoon:

Judge Verdin asked me to email you the proposed Protective Order that the South Carolina High School League (SCHSL) was submitting along with its Motion for a Protective Order that was heard yesterday at 3 p.m. I have attached the Protective Order for Judge Verdin's consideration, and I have copied in the plaintiff, Aminah Richburg, and Sarah Day Hurley, counsel for the co-defendant Rico Williams.

If you need anything else, please let me know.

Sincerely,
Michael Montgomery

SOWELL MICHAEL MONTGOMERY MEMBER VCARD

ELECTRONICALLY FILED - 2016 Dec 08 1:38 PM - GREENVILLE - COMMON PLEAS - CASE#2016CP2302113

Greenville Common Pleas

Case Caption: Aminah A Richburg vs. E A Rico Williams , defendant, et al

Case Number: 2016CP2302113

Type: Order/Judgment and Form 4

So Ordered

s/Letitia H. Verdin, SC Judge 2162

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)
AMINAH A. RICHBURG)
Plaintiff)
)
Vs.)
E.A. "RICO" WILLIAMS, DIRECTOR)
DISTRICT ONE SC BASKETBALL)
OFFICIALS ASSOCIATION AND THE)
SOUTH CAROLINA HIGH SCHOOL)
LEAGUE)
)
Defendants)

IN THE COURT OF COMMON PLEAS
Docket No. : 2016-CP-23-02113

REQUEST FOR HEARING

2016 DEC 20 AM 11:18

Plaintiff's Attorney: Pro Se Aminah A. Richburg

Mailing Address: 217 Plum Creek Lane Greenville, SC 29607

Telephone: 864-419-6707

Email: richburga@bellsouth.net

Defendants' Attorney: Michael Montgomery

Mailing Address P.O. Box 11449 Columbia, SC 29211

Telephone:

Email:

Defendants' Attorney: Sarah Day Hurley

Mailing Address: Post Office Box 1509 Greenville, SC 29602

Telephone: 864-552-4651 Fax: 864-282-5965

Email:

Type of Hearing: Civil Case

Time Needed: 2 hours

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Motion Requested by: Aminah A. Richburg (Pro Se) Date: December 20, 2016

For: ☒ Plaintiff ☐ Defendant

*****Section below to be completed by Clerk of Court.******

The hearing in this matter is scheduled for _____day of _____20_____,at_____(time)

☐ a.m./☐ p.m., Courtroom_____, before the Honorable_____for_____(length of time).

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	
Plaintiff	)	**SECOND NOTICE OF MOTION**
	)	**TO COMPEL 1st & 2nd INTERROGATORIES**
vs.	)	**REQUEST FOR A HEARING**
E.A. "RICO" WILLIAMS, DIRECTOR	)	
DISTRICT ONE SC BASKETBALL	)	
OFFICIALS ASSOCIATION AND THE	)	
SOUTH CAROLINA HIGH SCHOOL	)	
LEAGUE	)	
	)	
Defendants	)	

TO: Sarah Day Hurley, Esquire attorney for E.A. Rico Williams and J. Michael Montgomery attorney for the South Carolina High School League:

YOU WILL PLEASE TAKE NOTICE that Aminah A. Richburg, Pro Se Plaintiff, was present before Honorable Leititia Verdin the Presiding Judge of the Greenville County Court of Common Pleas on November 2, 2016. The Motion to Compel requested on October 11, 2016, was not addressed. Previously on September 20, 2016, the Honorable Roger L. Couch communicated to the Plaintiff on the specific matter of discovery that she could file a motion to compel and in that motion the Plaintiff must state what the Plaintiff is seeking and why the information should be made to the Plaintiff. The Plaintiff has provided the following information in this document

The Plaintiff seeks a Motion to Compel to acquire the information and documents requested according to DEFINITIONS on June 20, 2016 through; Plaintiff, Aminah A. Richburg First Set of Continuing Interrogatories To Defendant and Plaintiff, Aminah A. Richburg First Set of Request for Production to Defendant and the Second Set of Continuing Interrogatories to Defendant, October 21, 2016. The Defendant E.A. "Rico" Williams/ Sarah Day Hurley, Esquire attorney and the Defendant, South Carolina High School League (SCHSL)/ J. Michael Montgomery attorney responded to Plaintiff by objecting to each Interrogatory as follows:

DEFINITIONS

The following definitions apply to these Interrogatories:

A. The terms "you" and "your" when used herein refer to the defendant above named.
B. The term "identify" when used herein in connection with natural persons means to state their full name, title and job description, if applicable, and their present business and resident addresses, if applicable.

ENTERED COMPUTER

C. The term "identify" when used herein in conjunction with other entities means to state the name an present address of each such entity.

D. When an Interrogatory ask for a description or identification of a document, the response shall be given in sufficient detail to enable a party or person to whom the subpoena or request to produce documents is directed to identify fully the document sought to be produced and to enable counsel for the defendant to determine that such documents, when produced, are in fact the documents described.

E. The term "document" when used herein means all original writings of any nature whatsoever and all non-identical copies thereof in your possession, custody or control, regardless of where located, all other documents of which you have knowledge and includes, but is not limited to, correspondence, diagrams, other written communication, data processing storage units, tapes, contracts, video cassettes, agreements, notes, schedules, summaries, compilations, analyses, memoranda indices, work papers, studies, surveys, internal and external reports, diaries, calendars, films, photographs, minutes of meetings, invoices, receipts, and all other documents as defined in Rule 34 of the South Carolina Rules of Civil Procedure. In all cases where original and/or non-identical copies are unavailable, "documents" also means copies thereof.

FIRST INTERROGATORIES

1. Give the names and address of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

a. *Aminah A. Richburg*
217 Plum Creek Lane
Greenville, South Carolina 29607
No written or recorded statement has been provided.
Ms. Richburg is the plaintiff and is expected to testify as to the circumstances the incident that is the subject of this matter.

b. *Rico Williams*
Address unkown
No written or recorded statement has been provided.
Mr. Williams is the director for District One of the SC Basketball Officials Association and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

c. *Skp Lax*
c/o undersigned counsel
No written or recorded statement has been provided.
Mr. Lax is employed by the South Carolina High School League and is expected to testify as to his communication with the plaintiff regarding the incident that is the subject of this matter.

d. *Members of the District One Board of Directors*
(names unknown)
No written or recorded statements have been provided.

Members of the District One Board of Directors are expected to testify as to the reason for any decisions regarding plaintiff's future application for membership.

e. *The defendant, SCHSL, reserves the right to identify other witnesses whose names become known during the course of discovery.*

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601

a. Aminah A. Richburg
217 Plum Creek Lane
Greenville, South Carolina 29607
No written or recorded statement has been provided.
Ms. Richburg is the plaintiff and is expected to testify as to the circumstances the incident that is the subject of this matter.

b. Rico Williams
1 Ridgeside Court
Greenville, SC 29617
Mr. Williams may be contacted through his undersigned counsel
No written or recorded statement has been provided.
Mr. Williams is the director for District One of the SC Basketball Officials Association and is expected to testify as to the circumstances surrounding the incident that is the subject of this matter.

c. Skip Lax
[address unknown]
No written or recorded statement has been provided.
Mr. Lax is employed by the South Carolina High School League and is expected to testify as to his communication with the plaintiff regarding the incident that is the subject of this matter.

d. Members of the District One Board of Directors
(names to be provided)
No written or recorded statements have been provided.
Members of the District One Board of Directors are expected to testify as to the reason for any decisions regarding plaintiff's future application for membership.

e. This Defendant, reserves the right to identify other witnesses whose names become known during the course of discovery.

- Plaintiff- Why Information/Documentation Sought- Accepted
  The first and last names of the District One Board of Directors expected to testify not revealed.

2. Supply the following information with respect to each individual whose name you have given in the response to the preceding Interrogatory:
   a. Location or locations where any such statements were made;
   b. The identity of the person or persons in whose presence such statement or statements were made;
   c. The time and date upon which such statements were made; and
   d. A summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.
   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
   Not applicable, as the defendant is not in possession of any written or recorded statements.

   RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
   Not applicable, as Defendant is not in possession of any written or recorded statements.

- **Plaintiff- Why Information/Documentation Sought Information Accepted**

3. Set forth a list of photographs, plats, sketches, or other prepared documents in possession of the party that relate to the claim or defense in the case.
   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
   The defendant, SCHSL, is in possession of the following:
   a. Sample officials application which includes the Code of Ethics for all officials (Bates labeled 001-002)
   b. Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.
   c. Email correspondence received by Skip Lax on February5, 2016 (Bates labeled 012-013)
   d. Email correspondence between Skip Lax and Aminah Richburg on February 9-11,2016 (Bates labeled 014-018.
   e. Email correspondence received by Skip Lax on March 14, 2016 (Bates labeled 019-020)
   f. Email correspondence received by Skip Lax on March 21, 2016 (Bates labeled 021)
   g. Ratings for all basketball officials for 2014-2015 and 2015-2016 (Bates labeled 022-036)
   h. List of basketball and football officials for District One (Bates labeled 037-044)
   RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
   a. SCBOA District 1 Contracts with Plaintiff for 2014 and 2015;
   b. Code of Ethics for the South Carolina Basketball Officials Association;
   c. February 5, 2016 email from Rico Williams to Aminah Richburg;
   d. February 22, 2016 email from Joedy Moots to Aminah Richburg;
   e. March 14, 2016 emails 9two0 from Rich Williams to: Skip Lax, Jerome Singleton, and Joedy Moots;
   f. March 21, 2016 email from Rico Williams to Aminah Richburg, with copies to Jerome Singleton, Skip Lax, Joedy Moots, and District One Board members;
   g. SCBOA District One Board meeting minutes from February 29, 2016.

- Plaintiff- Why Information/Documentation Sought

b. Sowell Gray Stepp & Laffitte, LLC, Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.

The Plaintiff has never officiated an official varsity basketball game with pay from 2013-2016. The SCBOA and the South Carolina High School League are attempting to cover-up their marginal and deceitful practices from the public and they must be held accountable. The Defendants failed to send varsity scrimmages for 2013.

The Plaintiff served as a (U2-Lower Ranking Official) on 11/18/2014 at a required scrimmage (not an official game) with no payment at Greenville High School (Home), Byrnes HS - Visitor, Palmetto HS - Visitor with three officials, Lateef Muhammad (Referee), John Williams (U1), Charles A. Edens (U1) and Sean O'Connell (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/20/2014 at a required scrimmage (not an official game) with no payment at Easley High School (Home), Powdersville HS - Visitor, with three officials, Gordon Greer (Referee), No Name Provided Arbiter (U1), Anthony L. McDavid (U2) and No Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/22/2014 at a required scrimmage (not an official game) with no payment at Carolina High School (Home), Christ Church HS - Visitor, with two officials, David C. Kirk (Referee), No Name Provided Arbiter (U2), No

Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U1-Lower Ranking Official) on 12/2/2014 at a required scrimmage (not an official game) with no payment at Pleasant Grove BC Greer (Home), Greenville Hurricanes HS - Visitor, Brashier Middle College, with one official, Ray Martin (Referee). The Plaintiff was required to officiate the high school scrimmage for the entire game. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/10/2015 at a required scrimmage (not an official game) with no payment at Hillcrest High School (Home), and Greer HS – Visitor, with three officials, David C. Kirk (Referee), Audrey Cox (U1), John Williams (U2) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/17/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three officials, E. A. Williams (Referee), Steward Lawrence (U1), Jim Geyer (U1) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/19/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three officials, Steward Lawrence (Referee), Jay Ratterree (U1), Jermaine Counts (U2) .The Plaintiff was required to officiate the high

school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

Information Accepted – Protective Order

4. Identify every witness known to you or to your attorney who claim to have seen or heard the Plaintiff through its agents, servants, or employees, make any statement or statements pertaining to any of the events or happenings alleged in the Defendant's answer or in the Complaint, as well as a description of those statements.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, would refer to the email correspondence provided by Rico Willlams, which is referenced above.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant would refer Plaintiff to the emails produced herewith. In addition, Defendant would refer Plaintiff to the minutes of the SCBOA Board meeting on February 29, 2016 and the list of the Board members in attendance at that meeting.

- Plaintiff- Why Information/Documentation Sought

The Plaintiff seeks the names of all Board Members that contract and solicit basketball officiating services to various organizations including YBOA in the Upstate besides E.A. Rico Williams.

The Plaintiff seeks all correspondence between Joedy Moots (Officials Representative, South Carolina High School League) and E.A. Rico Williams. The Plaintiff sought the assistance of the (Officials Representative) Joedy Moots in confidence and Mr. Joedy Moots shared the communication with Mr. E.A. Williams and the Plaintiff would like to know why it was done and a copy of the policy that supports organization marginality with the behavior of Mr. Moots. (Williams 00017).

The Defendant must provide all information/documents discussed during the SCBOA Board meeting on February 29, 2016, especially the Officials Representative Response read during the meeting. (Williams 00017).

Aminah Richburg
-Wrote SCBOA Official's Representative
-SCBOA Officials Representative Response Read – What SCBOA Officials Representative Response Read? The Defendant must communicate what document was shared during the meeting
Reviewed District Facts – The Defendant must provide all reviewed district facts

The Defendant must provide all ratings from other partners as well as the Plaintiffs rating with her partners from 2013-2016.

The Defendant must provide the actual vote for all Board Members listing first and last names (Williams 00017). The tally presented has been tampered and does not appear to be valid nor its interpretation. The Plaintiff completed her third year as an official in February of 2016.

5. Please provide a copy of all sign in sheets or attendance sheets with arrival times for all members attending meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, does not keep or maintain sign-in sheets or attendance sheets for meetings of the District One Basketball Officials Association, and it would refer to the defendant, Rico Williams, for any documents that may be responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff - Why Information/Documentation Sought
  The Defendant did not provide the requested documents for sign in sheets or attendance sheets with arrival times for all members attending meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years. The Defendant communicated the importance of arrival times for all meetings attended by members of the SCBOA and those conducted by the South Carolina High School League, therefore the Defendant must provide the requested documents

a. The Plaintiff can prove that the Defendants conduct in this matter is wrongful and they are guilty of defamation, malice, negligence and/or recklessness. Every SCBOA District One meeting the Plaintiff has attended as a Basketball official for the past three years, all officials are credited for attendance at roll call at the conclusion of the meeting. The Plaintiff has attended basketball officials meetings conducted by The South Carolina High School League and all that is required for attendance is a signature or check performed by the district director before the conclusion of the meeting. The same practice continues to be observed by the Plaintiff for Football Officials, Softball Officials, Volleyball Officials and Lacrosse Officials. The Defendant E.A. Rico Williams created the meeting arrival times of the Plaintiff and communicated them in his email to South Carolina High School League to support his personal

agenda to suspend the membership of the Plaintiff. The Defendant must provide the sign in sheets with arrival times for all members for the past five (5) years.

6. Please provide a copy of all basketball officials that were assigned games with the Plaintiff for the past three (3) years under District One South Carolina Basketball Officials Association and the South Carolina High School League.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, does not maintain records of other officials that would have been assigned games with the plaintiff directly from the SCHSL for varsity sports through Arbiter. The defendant, SCHSL, would refer to the defendant, Rico Williams, for any documents he may have regarding sub-varsity contest that would have been assigned at the district level.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff- Why Information/Documentation Sought

The Defendant failed to send records of all prior scrimmages in 2013 (Williams 00022-00032). The Defendant failed to supply the names of basketball officials assigned games with the plaintiff
(Williams 00022-00032) , Game 12805- Referee 1/6/2014,12536-Referee 1/21/2014, 13092 (U2) 6/26/2014, 13093 (U2) 13093 6/26/2014, 13094 (U2) 6/26/2014, 13378 11/13/14 (U1), Observer, 15044- 11/20/2014 (U2), (U2), 15064-11/22/14 (U1),(U2).
Scrimmages Lost – SCHSL
The Defendant must provide a written document communicating that the record of all scrimmages are lost.

7. Please provide a copy of all the school assignments for basketball games for the Plaintiff under the South Carolina High School League through District One South Carolina Basketball Officials association for the past three (3) years.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, is only in possession of assignemnts for varsity basketball contest in 2014-2015 or 2015-2016. The defendant, SCHSL, would refer to the defendant, Rico Williams, for any documents he may have regarding sub-varsity contest that would have been assigned at the district level.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

- Plaintiff- Why Information/Documentation Sought
  Defendant failed to provide scrimmages for 2013-2014 season.
  Defendant must provide a written communication stating the scrimmages are lost.

8. The Defendant E.A. "Rico" Williams must provide a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years.
   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
   Not Applicable

   RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
   Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

   - Plaintiff- Why Information/Documentation Sought
   The Defendant failed to send a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years.
   The Plaintiff would require the Defendant to provide the first and last names of the basketball officials that were assigned games with the Plaintiff assigned by E.A."Rico" Williams.
   The Plaintiff was assigned games by E.A. "Rico" Williams through his business with members of the SCBOA District One that are sub-Varsity/Varsity officials. The Plaintiff's continuously received assignments with E.A. "Rico" Williams for his business and the first communication sent by the Defendant supports the requirement for this information and documentation. (Williams 0004)
   The Plaintiff has submitted documents of some dates assigned by E.A. Rico Williams.
   The Plaintiff requires the Defendant to resubmit based on documents she has provided.

9. The Defendant E.A. "Rico" Williams must provide list all of officials assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past (3) years.
   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
   Not Applicable

   RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
   Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.

   - Plaintiff- Why Information/Documentation Sought

The Defendant E.A. "Rico" Williams failed to provide a list of all of the officials he assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past (3) years.

10. Please provide the identity of the "Someone" communicated in the email sent by E.A. Rico Williams on Friday, February 5, 2016 at 1:49 pm to the Plaintiff, Skip Lax and others that received the message on behalf of the Plaintiff.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, does not know the identity of the person in question.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
John Williams

- Plaintiff- Why Information/Documentation Sought
- The Defendant must provide all ratings from John Williams from 2013-2016.
- The Defendant must provide the Plaintiffs rating with John Williams from 2013-2016.
  The Plaintiff communicated her disdain with John Williams behavior towards her before the game 12864, 1/27/2014 , Monday (4:00) Basketball JV Boys @ Welcome Baptist Church- Easley Home School vs Fountain Inn Christian School in the Arbiter Officials Rating System, Mr. John Williams behavior was intentional to blight the Plaintiff based on the communication in the system.

11. Provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico" Williams on February 5, 2016 at 1:49 pm.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, does not know the background, names, and affiliations of all the recipients of the email in question. The defendant, SCHSL, is only aware that several of the recipients – albanister77@gmail.com; audrex.cox94@yahoo.com; hullingerge@yahoo.com; and ken@kenpelanda.com – are current or former officials.
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this request on the grounds that it is overly broad, and also vague to the extent it seeks the "affiliations" of such individuals. Subject to and without waiving this objection, Defendant will supplement this response with a list of the SCBOA Board members and their addresses, to the extent known.

- Plaintiff- Why Information/Documentation Sought
  The Defendant has failed to provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico Williams on February 5, 2016. (Williams 0004)

Information Accepted

12. Provide documentation of the communication for records requested by Bob Wnukowski and Kevin Brown on behalf of the Plaintiff from E.A. "Rico" Williams.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, did not request records and therefore is not in possession of documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant is not in possession of any documentation responsive to this request. All communications were by telephone.

- **Plaintiff -Why Information/Documentation Sought**
  Documentation presented (Williams 00015 – Dated and Signed on 8/26/16) – Communication Bob Wnukowski and Kevin Brown. (Williams-00017)Cites – **Reviewed District Facts – Documentation communicated, the Defendants must provide documentation.**

13. Provide documentation of all schools that blocked the Plaintiff and the Schools the Plaintiff blocked for South Carolina High School League/ SCBOA District One officiating services for all sports for District One.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, is in possession of the names of schools that blocked the plaintiff through the Arbiter software, which would only apply to varsity contest for the SCHSL. Due to the sensitive and private nature of the request, the defendant, SCHSL, will provide this information upon entry of a Protective Order.
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

- **Why Information/Documentation Sought**
  The Plaintiff can prove that the Defendants conduct in this matter is wrongful and they are guilty of defamation, malice, negligence and/or recklessness. The Plaintiff was a member of SCBOA District 1 for the 2015-16 season and received middle school girls and boys assignments beginning December 2, 2015 at League Academy, December 3, 2015 at Mauldin Middle School, December 10, 2015 at Bryson Middle School, December 11, 2015 at Eastside High School, December 14, 2015 at Tanglewood Middle School, December 17 at Sevier Middle School, January 7, 2016 at Greer Middle School, January 8, 2016 at Southside Christian School, January 13, 2016 at Sevier Middle School, 1/26/2016 at Welcome Baptist Church, 1/29/2016 at Dacusville Middle School, February 1, 2016 at Beck

Academy and the final game on 2/6/2016 at Tanglewood Middle School. The assignments reflect the same schools the Plaintiff has been assigned since 2013. The Plaintiff blocked Christ Church Episcopal School were her daughter attends and her son attended. Hillcrest Middle School was also blocked by the Plaintiff because that is her place of employment. The documentation received from the Defendants (Williams 00020), do not reflect what was communicated by E.A. Rico Williams concerning schools that blocked the Plaintiff and the schools the Plaintiff blocked.

There are two dates that were blocked by Robert (Bob) Wnukowski, (January 4, 2016 and January 21,2016) the Plaintiff would like to know how and why because the Plaintiff sets her own blocks and had no need for Robert (Bob) Wnukowski to set blocks in Arbiter. The discrepancies apparent in the documentation labeled 0018-0032 support the Plaintiff's claims in her complaint, therefore the Motion to compel must be upheld.

Information Accepted – Protection Order – Michael Montgomery SCHSL

No Information sent by – Sarah Hurley- E.A. Rico Williams

14. Provide a listing of all basketball officials in South Carolina High School League/SCBOA District One that officiate football and volleyball.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 Please see the attached list

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will conduct a search of the SCBOA District One records and supplement this response to the extent such information may be obtained.

- **Why Information/Documentation Sought**

  The Defendant failed to produce a document listing basketball officials in South Carolina High School League/SCBOA District One that officiate football and volleyball.

  The Defendant created unofficial (0014 Williams), list Crotts, Michael, Edwards, Mack, Elmer, Joe, Greer, Gordon, Richburg, Aminah, Wunkowski, Bob for Interrogatories 14. The discrepancies apparent in the documentation supports the need for Motion to Compel to be upheld.

  Information Accepted

15. Provide documentation of South Carolina High School League/ SCBOA District One Board Meeting minutes and sign in sheets with member arrival times from 2013-2016.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, does not keep or maintain sign-in sheets or attendance sheets for meetings of the District One Basketball Officials Association, and it would refer to the defendant, Rico Williams, for any documents that may be responsive to this Request.
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this interrogatory to the extent it seeks information beyond the issues and claims in this case. Subject to this objection, Defendant will produce any minutes of the February 29, 2016 of the SCBOA Board meeting, as well as the sign-in sheets for the SCBOA District One meetings to the extent such information may be obtained.

- Plaintiff- Why Information/Documentation Sought
- Defendant failed to provide South Carolina High School League/ SCBOA District One Board Meeting minutes and sign in sheets with member arrival times from 2013-2016.
- A detailed list of first and last names of Board members attending the meeting with arrival times at the meeting on Februray 29, 2016 not provided. (Williams 00017)
- The Plaintiff seeks the names of all Board Members that contract and solicit basketball officiating services to various organizations including the YBOA in the Upstate besides E.A. Rico Williams.
- The Defendant communicated the importance of arrival times for all meetings attended by members of the SCBOA and those conducted by the South Carolina High School League, therefore the Defendant must provide the requested documents. (Williams 00005)

Information Accepted

16. Provide the documentation of the South Carolina High School League/ SCBOA District One Board Members present for the meeting on February 29, 2016 along with arrival times including the members individual vote/ termination for the Plaintiff.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, was not involved in this meeting and no one from its office attended the meeting on February 29, 2016. Therefore, it does not have any documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant will supplement this response upon receipt of the meeting minutes, from which the information sought may be obtained.

- Plaintiff- Why Information/Documentation Sought

- Documentation reflecting member's individual vote with first and last names indicating the vote to terminate the Plaintiff's membership was not provided or the reasons for the Plaintiff's termination.

- The Plaintiff seeks all correspondence between Joedy Moots (Officials Representative, South Carolina High School League) and E.A. Rico Williams. The Plaintiff sought the assistance of the (Officials Representative) Joedy Moots in confidence and Mr. Joedy Moots shared the communication with Mr. E.A. Williams and the Plaintiff would like to know why it was done and a copy of the policy that supports organization marginality with the behavior of Mr. Moots. (Williams 00017).
- The Defendant must provide all information/documents discussed during the SCBOA Board meeting on February 29, 2016, especially the Officials Representative Response read during the meeting. (Williams 00017).
- Aminah Richburg
- -Wrote SCBOA Official's Representative
- -SCBOA Officials Representative Response Read – What SCBOA Officials Representative Response Read? The Defendant must communicate what document was shared during the meeting
- Reviewed District Facts – The Defendant must provide all reviewed district facts
- The Defendant must provide all ratings from other partners as well as the Plaintiffs rating with her partners from 2013-2016.

17. Provide documentation of all ten officials communicated by E.A. "Rico" Williams that blocked the Plaintiff in the South Carolina High School League/ SCBOA District One.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, is in possession of the names of officials that blocked the plaintiff through Arbiter software, which would only apply to varsity contests for the SCHSL. Due to the sensitive and private nature of the request, the defendant, SCHSL, will provide this information upon entry of a Protective Order.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

- Plaintiff- Why Information/Documentation Sought

The Plaintiff has never officiated an official varsity basketball game with pay from 2013-2016. Therefore the names of schools that blocked the Plaintiff through the Arbiter program must be provided and the protective order must be dismissed. The SCBOA and the South Carolina High School League are attempting to cover-up their marginal and deceitful practices from the public and they must be held accountable. The Defendants failed to send varsity scrimmages for 2013.

The Plaintiff served as a (U2-Lower Ranking Official) on 11/18/2014 at a required scrimmage (not an official game) with no payment at Greenville High School (Home), Byrnes HS - Visitor, Palmetto HS - Visitor with three officials, Lateef Muhammad (Referee), John Williams (U1), Charles A. Edens (U1) and Sean O'Connell (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Information Accepted – Protection Order- Michael Montgomery –SCHSL
No Information sent by – Sarah Hurley – E.A. Rico Williams

Plaintiff served as a (U2-Lower Ranking Official) on 11/20/2014 at a required scrimmage (not an official game) with no payment at Easley High School (Home), Powdersville HS - Visitor, with three officials, Gordon Greer (Referee), No Name Provided Arbiter (U1), Anthony L. McDavid (U2) and No Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/22/2014 at a required scrimmage (not an official game) with no payment at Carolina High School (Home), Christ Church HS - Visitor, with two officials, David C. Kirk (Referee), No Name Provided Arbiter (U2), No Name Provided (U2).The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U1-Lower Ranking Official) on 12/2/2014 at a required scrimmage (not an official game) with no payment at Pleasant Grove BC Greer (Home), Greenville Hurricanes HS - Visitor, Brashier Middle College, with one official, Ray Martin (Referee). The Plaintiff was required to officiate the high school scrimmage for the entire game. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/10/2015 at a required scrimmage (not an official game) with no payment at Hillcrest High School (Home), and Greer HS – Visitor, with three officials, David C. Kirk (Referee), Audrey Cox (U1), John Williams (U2) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/17/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three officials, E. A. Williams (Referee), Steward Lawrence (U1), Jim Geyer (U1) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The Plaintiff served as a (U2-Lower Ranking Official) on 11/19/2015 at a required scrimmage (not an official game) with no payment at Greer High School (Home), Clinton HS - Visitor, and Palmetto HS - Visitor with three officials, Steward Lawrence (Referee), Jay Ratterree (U1), Jermaine Counts (U2) .The Plaintiff was required to officiate the high school scrimmages with several officials substituting in and out for quarters. (WILLIAMS 00026)

The defendant must provide the names of schools and officials that blocked the Plaintiff for Varsity contest and the dates and times the blocks were made in the system.

18. Provide all fee's collected by the South Carolina High School League for every coach ejected from a game and penalized financially from 2013-2016.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201 The defendant, SCHSL, objects to this Interrogatory on the grounds that it is overbroad, irrelevant, ant not calculated to lead to the discovery of admissible evidence. Not waiving this objection, The South Carolina High School League has not calculated the total number of fes collected, but it would repond that there were thirty-three (33) basketball coach ejections from 2013-2016, and the fines for ejections range from $100-$500.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
This Defendant is not in possession of the information sought.

- Plaintiff- Why Information/Documentation Sought

The South Carolina High School League reprimands and fines all that participate in Scholastic sports in the State of South Carolina since its existence. The SCHSL must be held to the very same principles it upholds with its organizational practices when maleficence has occurred.

19. Identify each and every person whom you have retained as an expert, identify:
    a. The subject matter of the expert's anticipated testimony;
    b. The substance of the facts and opinions upon which the expert is expected to testify;
    c. A summary of the grounds for each opinion to which the expert is expected to testify
    d. The educational background and qualifications of the expert; and
    e. Whether, and how many times, the expert has previously testified as an expert in a court of law.

    RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

    The defendant, SCHSL, has not retained an expert but will supplement this Response should an expert be retained.

    RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601

    Defendant has not retained an expert but will supplement this Response should an expert be retained to testify at trial.

- **Plaintiff- Why Information/Documentation Sought**
  Response Accepted

REQUEST FOR PRODUCTION

1. Please produce all statements or any other written or printed documents relating to the claim set forth in the Defendants answer to the Plaintiff's Complaint.

   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201

   a. *Sample officials application which includes the Code of Ethics for all officials (Bates labeled 001-002)*
   b. *Documentation from Arbiter program regarding plaintiff's status as a varsity official (Bates labeled 003-011); The defendant, SCHSL, is also in possession of the names of schools and officials who blocked the plaintiff through the Arbiter program. These names will be provided to the plaintiff upon entry of a Protective Order, and they are labeled as Bates numbers 10 and 11.*
   c. *Email correspondence received by Skip Lax on February5, 2016 (Bates labeled 012-013)*
   d. *Email correspondence between Skip Lax and Aminah Richburg on February 9-11,2016 (Bates labeled 014-018.*
   e. *Email correspondence received by Skip Lax on March 14, 2016 (Bates labeled 019-020)*
   f. *Email correspondence received by Skip Lax on March 21, 2016 (Bates labeled 021)*
   g. *Ratings for all basketball officials for 2014-2015 and 2015-2016 (Bates labeled 022-036)*
   h. *List of basketball and football officials for District One (Bates labeled 037-044)*

   RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601

a. SCBOA District 1 Contracts with Plaintiff for 2014 and 2015;
b. Code of Ethics for the South Carolina Basketball Officials Association;
c. February 5, 2016 email from Rico Williams to Aminah Richburg;
d. February 22, 2016 email from Joedy Moots to Aminah Richburg;
e. March 14, 2016 emails 9two0 from Rich Williams to: Skip Lax, Jerome Singleton, and Joedy Moots;
f. March 21, 2016 email from Rico Williams to Aminah Richburg, with copies to Jerome Singleton, Skip Lax, Joedy Moots, and District One Board members;
g. SCBOA District One Board meeting minutes from February 29, 2016.

- Plaintiff- Why Information/Documentation Sought
  Information Accepted

2. Please produce all photographs, diagrams, drawings, videocassettes, audiocassettes, or other similar material set forth in the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, is not in possession of documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
See documents produced herewith.

- Plaintiff- Why Information/Documentation Sought
  The Plaintiff needs clarity with the communication from the Defendant – See documents herewith.

3. Please produce all statements of possible witnesses, whether written, oral, summarized, or otherwise produced in any manner, set forth in the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, is not in possession of documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant is not in possession of any witness statements.

- Plaintiff- Why Information/Documentation Sought
- Information Accepted

4. Please produce all tax returns of the Defendants. Both Federal and State returns, for the five (5) years preceding the incident set forth in the Defendants answer to the Plaintiff's

Complaint as well as any returns made subsequent to the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, objects to this Interrogatory on the grounds that it is overbroad, irrelevant, and not calculated to lead to the discovery of admissible evidence.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant objects to this Request on the grounds the information sought is not relevant to any claim or defense in this action, and is not reasonably calculated to lead to the discovery of admissible evidence.

- Plaintiff- Why Information/Documentation Sought
  The Defendants operate businesses in the State of South Carolina and are entrusted to operate their businesses with integrity therefore they are subject to transparency when the behavior of the organization is riddled with maleficence practices and therefore the tax returns and any policies to protect the organization when marginal practices affect citizens in the state and community they serve are brought into question.

5. Please provide any documents or things not heretofore requested which relate to the Plaintiff's First Set of Continuing Interrogatories, served herewith, or which were relied upon, referred to, or otherwise referenced or consulted in connection with the Defendant's responses to the Plaintiff's First Set of Continuing Interrogatories, served herewith.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
Please see Response to Request No. 1, above.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
See Response to Request No. 1 above.

- Plaintiff- Why Information/Documentation Sought
  Information Accepted

6. Please provide any other documents or materials which you intend to introduce in the trail of this case.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
The defendant, SCHSL, would respond that it is premature to determine which documents or materials it will seek to introduce at the trail of this case, and it will supplement this Response

following discovery and before trial. Furthermore, the defendant would refer to the items listed in Response to Request No. 1 as documents it may seek to introduce.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
Defendant would respond that it is premature to determine which documents or materials he and his counsel will seek to introduce at the trail of this case, and he will supplement this response following discovery and before trial. Furthermore, Defendant would refer Plaintiff to the items listed in Response to Request No. 1 as documents he may seek to introduce.

- **Plaintiff- Why Information/Documentation Sought**

Information Accepted

7. Please provide copies of any documents received via subpoena or subject to a Freedom of Information Act request relating to the Defendants answer to the Plaintiff's Complaint.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201
Not applicable at this time.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, 29601
None at this time.

- **Plaintiff- Why Information/Documentation Sought**

Information Accepted

DEFENDANT'S SOUTH CAROLINA HIGH SCHOOL LEAGUE'S RESPONSES TO PLAINTIFF'S SECOND SET OF CONTINUING INTERROGATORIES

TO: AMINAH A. RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF: The Defendant the South Carolina High School League (here in after "SCHSL"), herein responds to Plaintiff's Second Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure.

GENERAL OBJECTIONS

1. The defendant, SCHSL I, objects to each Interrogatory to the extent that it seeks information or documents which were compiled in anticipation of litigation or for trial and which are protected by the attorney-client, work-product doctrines. This defendant further objects to each and every Interrogatory to the extent the information called for is protected by the attorney-client privilege, consulting expert privilege, or any other privilege. The disclosure of any information protected by any of the foregoing privileges shall be deemed inadvertent and not with the intention to waive any privilege with regard to the information disclosed.
2. Any information produced in response hereto is produced expressly subject to any objections contained herein and is produced without in any way waiving or intending to waive any objections

that the defendant, SCHSL, may have with respect to the subsequent use of such information and this defendant respectfully reserves:

a. All questions as to admissibility of any and all such information, in whole or in part, or of the subject matter thereof;
b. The right to object to the use of any such information, in whole or in part, or the subject matter covered thereby, in any subsequent step or proceeding in this action, on any or all of the foregoing grounds or on any proper grounds whether or not enumerated above; and
c. The right to object to any and all grounds at any time to Interrogatories or other discovery procedures involving or related to the subject matter of the information sought by the requesting party.

3. The defendant, SCHSL, objects to each and every Interrogatory to the extent that it seeks information that is equally available to or already in the possession of the party and its counsel and the burden on the party or its counsel to obtain the requested information is no greater than the burden on this defendant.
4. The defendant, SCHSL, objects to each and every Interrogatory to the extent it is overly broad, oppressive, unduly burdensome, or unduly expensive. This defendant further objects to each and every Interrogatory to the extent it seeks information not limited in time, nature, and scope.
5. The defendant, SCHSL, objects to each and every Interrogatory to the extent that it seeks confidential or proprietary information. Similarly, this defendant reserves the right to redact sensitive or proprietary information from any documents that it produces in response here under.
6. The defendant, SCHSL, states that its agreement to produce documents responsive to these Interrogatories is to produce any documents in its possession and control, and to the extent which they exist, for inspection in the offices of Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

SECOND SET OF INTERROGATORIES

1. Please provide a listing of first and last names of all SCBOA District I officials for 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High school League, would state that it is not in possession of a listing of all SCBOA District 1 Officials from 2013-2016. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each official by name, district, years of experience and rating. The defendant SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled 045-075). Again, these ranking would provide the first and last names of all SCBOA District I officials for 2013-2016.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

2013-2014 Official Names District I	Years of Experience	2014-2015 Official Names District I	Years of Experience	2015-2016 Official Names District I	Years of Experience
LINDER, TIM T.	18	DENDY, DAVID	29	AHART, HARVEY JR	
WARD, DONALD C.	16	BROWN, KEVIN	15	ALLISON, DAVID KENNEDY	
ELMER, JOSEPH N.	21	LINDER, TIM T.	20	ARNOLD, SIGMUND	
COURTRIGHT, SCOTTY	39	PELANDA, KEN B.	14	BANISTER, WILLIAM	
BROWN,KEVIN	14	CHAPPELL, DOUG B.	14	BATSON, DREUGH	
PELANDA, KEN B.	13	NORRIS, JENNIFER	20	BLACK, PAUL	
BROWN, FRANKIE	8	COURTRIGHT, SCOTTY	40	BLACK, ROBERT	
CHAPPELL, DOUG B.	13	HULLINGER, GARY	16	BLUE, TRAVIS	
RODRIGUEZ, HECTOR	14	CARAWAY, JOHN B. JR.	15	BOOKER, J.C.	
DENDY, DAVID	27	WILLIAMS, E.A. "RICO"	20	BRITT, THOMAS	
CARAWAY, JOHN	14	MCGREGOR, BENNY W.	19	BROWN, KEVIN	
WESTFIELD, EVERETTE	20	ELMER, JOSEPH N.	22	BRYSON, JOHN	
HULLINGER,GARY	13	WNUKOWSKI, BOB	28	CARAWAY, BYRON	
WILLIAMS, E.A. "RICO"	18	KIRK, DAVID	15	CHAPPELL, DOUG	
CARR, TOM	10	CRAIG, JAMES K.	13	CLIKSCALE, BERNARD	
NORRIS, JENNIFER R.	19	GREER, GORDON K.	12	COOLEY, TAMARA	
MCGREGOR, BENNY W.	18	MCCAULEY, BOB	7	COUNTS, JERMAINE	
BANISTER, W. A "AL"	29	WARD, DONALD C.	18	COX, AUDREY	
BATSON, DREUGH H.	28	LAWERENCE, STEWARD	7	CRAIG, JAMES	
MCAUSTER, L.T. "LANNY"	13	BANISTER, W.A. "AL"	30	CROTTS, MICHAEL	
BLACK, PAUL E.	16	BROWN, FRANKIE	9	DENDY, DAVID	
THOMASON, JOE D.	23	MEEKINS, JAMES W.	23	EDENS, CHARLES	
MACMILLAN, DOUG	6	MACMILLAN, DOUG	7	EDWARDS, WILLIAM	
GREER, GORDON	11	CROTTS, MICHAEL	10	ELMER, JOESPH	
KIRK, DAVID	14	RODRIGUEZ, HECTOR	15	FAY, HARRY	
MEEKINS, JAMES W.	22	COX, AUDREY L.	11	GAFFNEY, SEAN	
LAFOY, RANDY	33	MARTIN, DANIEL L.	21	GARFIELD, KENNETH	
CRAIG, JAMES	12	HOLTZ, THOMAS D.	16	GEYER, JIM	
CROTTS, MICHAEL	9	GARFIELD, KEN	6	GGODLET, DANIEL	
BARKSDALE, ANDREW	7	ALLISON, DAVID	6	GREER, GORDON	
COX, AUDREY L.	10	BROWN, STEVE	11	GRISSET, LAMONT	
MCCAULEY, BOB	6	MCDAVID, ANTHONY	14	HARDEN, ALLAN	
EDENS, CHARLES A.	9	BATSON, DREUGH H.	29	HARRIS, JOHNATHAN (JOHN) W	
LAWERENCE, STEWARD	6	RATTEREE, JAY	5	HAYWOOD, KIMBERLY	
BARRON, BRAD	9	EDWARDS, W. MACK	39	HENDRICKS, CHADWICK	
EDWARDS, W. MACK	43	AHART, HARVEY	7	HOLTZ, THOMAS	
BRYSON, JOHN W.	8	LAFOY, RANDY	37	HULLINGER, GARY EUGENE	
MUHAMMAD, LATEEF S.	7	FAY, HARRY	7	JACQUES, FRANKLIN DENNIS	
MCDAVID, ANTHONY L.	13	BRYSON, JOHN W.	9	JONES, JAKIA KESHON	
MARTIN, DANIEL L.	20	ARNOLD, SIGMUND	6	KINZER, ANDREW	
HAYWOOD, KIMBERLY W.	18	EDENS, CHARLES	10	KIRK, DAVID C.	
ALLISON, DAVID	5	MUHAMMAD, LATEEF S.	8	LAFOY, RANDY	
GARFIELD, KEN	5	BOOKER, J.C.	7	LAWRENCE, STEWARD	
ARNOLD, SIGMUND	5	HARDEN, ALLAN	5	LINDER, TIM	
BOOKER, JC	6	BONADIO, WES	6	MACMILLIAN, DOUG	
SOLESBEE, JIM	5	SOLESBEE, JIM	6	MANGRUM, AUBREY	
WILLIAMS, LARRY E.	17	BATES, FRED	16	MANGRUM , ROBERT JR.	
WATSON, GREGORY	7	GEYER, JIM	5	MARTIN, DANIEL	
FAY, HARRY	6	WILLIAMS, JOHN	5	MARTIN, RAY	
RATTEREE, JAY	4	SIMS, CALVIN	5	MCCAULEY, ROBERT JR	
HARDEN, ALLAN	4	WILLIAMS, LARRY	1	MCDAVID, ANTHONY	
GEYER, JIM D.	4	MARTIN, RAY L.	4	MCGREGOR, BENNY	
WILLIAMS, JOHN	4	MANGRUM, ROBERT E. JR.	4	MEEKINS, JAMES, W	
HOLTZ, THOMAS	3	SLOAN, T.R	3	MISZTAL, BOBBY	
WELLS, ANTHONY D.	3	WILLIS, TAMMY D.	3	MUHAMMAD, LATEEF	
MANGRUM, ROBERT E. JR.	3	BENNETT, JOSEPH	3	MURCHISON, JASON	
MARTIN, RAY L.	3	HENDRICK, CHADWICK F.	3	NORRIS, JENNIFER	
SLOAN, T.R.	2	O'CONNELL, SEAN A.	1	O'CONNELL, SEAN A.	
CHILDRESS,JERRY	3	MAZZOU, ROBERT	1	PELANDA, KEN	
COUNTS, JERMAINE	2	GRISSETT, LAMONT	1	RAMSEY, MICHAEL	
WILLIAMS, JONATHAN E.	2	SYNDER, KENDRA	1	RATTEREE, JAY	
WILLIS, TAMMY	2	COOLEY, TAMARA	1	RICHARDSON, JOSEPH	
HENDRICK, CHADWICK F.	2	CALHOUN, NATAMBU	1	RICHBURG, AMINAH	
RAMSEY, MICHAEL	2	RICHBURG, AMINAH	2	ROBINSON, EDWARD MILTON	
TERRY, RODERICK K.	1			RODRIQUEZ, HECTOR	
HARRIS, NASHUN L.	1			SIMS, CALVIN	
HOUSTON, MICHAEL	1			SLOAN T.R. JR.	
O'CONNELL, SEAN A.	1			SNYDER, KENDRA JANELLE	
BENNETT, BYRON W.	1			SOLESBEE, JAMES	
RICHBURG, AMINAH	1			VICK, DONNIE RAY	
				WARD, DONALD CLEVELAND	
				WALTER, TIMOTHY C	
				WILLIAMS, CAL	
				WILLIAMS, E.A.	
				WILLIAMS, JOHN	
				WNUKOWSKI, ROBERT (BOB) C.	
				WORKMAN, GERARD ANTHONY	

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT

The Plaintiff has arranged the names according to the documents provided (labeled SCHSL 22-36) and (labeled 045-075). The Plaintiff sought the names of Members of District I to substantiate and reveal that the defendant E.A. Rico Williams knowingly created a false narrative with misguided factual information (Williams 00005) that ten officials marked the Plaintiff off , creating a scenario that the Plaintiff is difficult to work with her fellow District I officials as communicated by Mr. Joedy Moots (Williams 00009)when he stated "It seems you are having trouble with fellow officials and other schools. Accepted

2. Please provide a listing of first and last names of SCBOA District I officials that officiated games for E.A. "Rico" Williams from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601

NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT

(Williams 00001) SCBOA District I Contract – 24. I agree that I will not use the District I membership for solicitation purposes. The Defendant E.A. Rico Williams has possibly contracted over eighty percent of District I Members for his personal business and he solicited the individuals for their support to make him director influenced by the opportunities the Defendant provided to District I officials. The Plaintiff has a communication in which the Defendant asked for assistance with covering a game and asking the Plaintiff to set a block in Arbiter so she would be available to support his business. The Plaintiff seeks the first and last names of SCBOA District I officials for discovery.

3. Please provide a listing of first and last names of Board members of the SCBOA District I that officiated games for E.A. "Rico" Williams 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601

NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT

Williams 00001) SCBOA District I Contract – 24. I agree that I will not use the District I membership for solicitation purposes. The Defendant E.A. Rico Williams has possibly contracted over eighty percent of the District I Board Members for his personal business and he solicited the individuals for their support to make him director influenced by the opportunities the Defendant provided to District I officials. The Plaintiff has a communication in which the Defendant asked for assistance with covering a game and asking the Plaintiff to set a block in Arbiter so she would be available to support his business. The Plaintiff seeks the first and last names of SCBOA District I Board Members for discovery.

4. Please provide the E.A. "Rico" Williams business game schedules for SCBOA District One Board Members that officiated games through E.A. "Rico" Williams business from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601

NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT

Williams 00001) SCBOA District I Contract – 24. I agree that I will not use the District I membership for solicitation purposes. The Defendant E.A. Rico Williams has possibly contracted over eighty percent of District I Board Members for his

personal business and he solicited the individuals for their support to make him director influenced by the opportunities the Defendant provided to District I officials. The Plaintiff has a communication in which the Defendant asked for assistance with covering a game and asking the Plaintiff to set a block in Arbiter so she would be available to support his business. The Plaintiff seeks the schedules of SCBOA District I Board Members that officiated basketball games for E.A. Williams business for discovery.

5. Please provide the game schedules for all basketball contest for SCBOA District One Board Members from 2013-2016 through the South Carolina High School League and SCBOA District One.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this interrogatory on the grounds that it is overbroad, unduly burdensome, and not proportional to the needs of the case. Further responding, the defendant, South Carolina High School League, would only have access to varsity contest but would not be able to easily retrieve this information, as game schedules for varsity basketball contests are purged every year by Arbiter.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601

NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT

(Williams 00002) According to the Code of Ethics – I understand and agree that the booking office will make my assignments according to the rules pertaining to booking officials. Releases and restrictions to be observed in booking my schedule for the season will be sent to the booking office. Subject to these releases and restrictions to be observed in booking my schedule for the season will be sent to the booking office. Subject to these releases and restrictions, the booking office is empowered to accept and close assignments for the open dates on my schedule. I agree to uphold and observe the constitution, by –laws and booking regulations of the South Carolina Basketball Officials Association. The Plaintiff has retrieved the names of the SCBOA District One Board members the Plaintiff through discovery will observe the assignments for officials other that herself with a minimum of three years' experience.

6. Please provide a listing of first and last names of SCBOA District One Members terminated for future application for the past five years and reasons for termination.
RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.
The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this Request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT
(00004-00005 Williams) The Defendant E.A. Williams and others published one or more oral and written false statements which were intended to impeach the Plaintiff's honesty, integrity, virtue or reputation and purposefully conspired to terminate the Plaintiff's membership with SCBOA District and henceforth communicated with malice that if there is any intent for the Plaintiff to apply for future membership, her application (WILL NOT be accepted) (00012 Williams). The grounds for the termination communicated by all of the Defendants

- Recent Communication – E.A. "Rico" Williams -District One Director
- Recent Communication – Mr. Joedy Moots – The Officials Association's Representative on the South Carolina High School League's Executive Committee – Confidential – Unprofessional and Unethical behavior of Mr. Joedy Moots by sharing communication between the Plaintiff and himself- that was shared with Board Members (00017 Williams) to solidify the conspiracy act influencing Board Members to support the termination of the Plaintiff.
- Allegations of the Plaintiff's discontent and dissatisfaction with present and future leadership and direction of District One only communicated by E.A. Rico Williams. The Plaintiff never made such statements.
- Allegations of the Plaintiff's denunciation of Mr. Moot's response to your contact further illustrates your displeasure with local and State leadership only communicated by E.A. Rico Williams. The Plaintiff never made such statements.

The Plaintiff seeks discovery on members that have been terminated from SCBOA District One and reasons for their termination. It is clear in the communication sent by E.A. Rico Williams was supported by members of the South Carolina High School

League (00011 Williams) defamation of the plaintiff was made with malice, recklessness and intentional disregard of the Plaintiff's rights.

7. Please provide the number of blocks for each member of the SCBOA District I officials for other officials that are members in the SCBOA District I through the Arbiter from 2013-2016. (The Plaintiff does not seek the names for all blocks for each member of District I SCBOA, only the number).

   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

   The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not proportional to the needs of the case. Further responding, the defendant, South Carolina High School League, would only have access to blocks for varsity contest but would not be able to easily retrieve this information, as it would have to separately access each official's profile. Moreover, the current number of blocks may not accurately represent the number of blocks in prior years, as officials can adjust blocks at any time.

   RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601

   NO RESPONSE PROVIDED

   PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT

   The Plaintiff seeks discovery (00005 Williams) from our records you are marked (blocked) by two schools and by ten (10) officials and literally every one of them are higher rated either sub-varsity are officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem necessary. The Defendant communicated his ability to retrieve the information found in (00005 Williams). The Defendant's response to the interrogatory supports Defendant's defamation of the Plaintiff whereas the knowledge makes the grounds for termination irrelevant.

8. Please provide the number of school blocks for each member of the SCBOA District I officials from 2013-2016 through Arbiter. (The Plaintiff does not seek the names of the schools only the number).

   RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

   The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not proportional to the needs of the case. Further responding, the defendant, South Carolina High School League, would only have access to blocks for varsity contests but would not be able

to easily retrieve this information, as it would have to separately access each official's profile. Moreover, the current number of school blocks may not accurately represent the number of blocks in prior years, as schools and officials can adjust blocks at any time.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT
The Plaintiff seeks discovery (00005 Williams) from our records you are marked (blocked) by two schools. The Defendant communicated his ability to retrieve the information found in (00005 Williams). The Defendant's response to the interrogatory supports Defendant's defamation of the Plaintiff whereas the knowledge makes the grounds for termination irrelevant.

9. Please provide the first and last names of all females that are members of the SCBOA District I from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District 1 that is grouped by gender, age, or experience. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each officials by name, district, years of experience, and rating. The defendant, SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled 045-075). Again, these rankings would provide the first and last names of all SCBOA District I officials for 2013-2016, from which their gender could be gleaned.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT
Gender Gleaned by the Plaintiff - Accepted

2013-2014 Official Names District I	Years of Experience	2014-2015 Official Names District I	Years of Experience	2015-2016 Official Names District I	Years of Experience
LINDER, TIM T.	18	DENDY, DAVID	29	AHART, HARVEY JR	
WARD, DONALD C.	16	BROWN, KEVIN	15	ALLISON, DAVID KENNEDY	
ELMER, JOSEPH N.	21	LINDER, TIM T.	20	ARNOLD, SIGMUND	
COURTRIGHT, SCOTTY	39	PELANDA, KEN B.	14	BANISTER, WILLIAM	
BROWN,KEVIN	14	CHAPPELL, DOUG B.	14	BATSON, DREUGH	
PELANDA, KEN B.	13	NORRIS, JENNIFER	20	BLACK, PAUL	
BROWN, FRANKIE	8	COURTRIGHT, SCOTTY	40	BLACK, ROBERT	
CHAPPELL, DOUG B.	13	HULLINGER, GARY	16	BLUE, TRAVIS	
RODRIGUEZ, HECTOR	14	CARAWAY, JOHN B. JR.	15	BOOKER, J.C.	
DENDY, DAVID	27	WILLIAMS, E.A. "RICO"	20	BRITT, THOMAS	
CARAWAY, JOHN	14	MCGREGOR, BENNY W.	19	BROWN, KEVIN	
WESTFIELD, EVERETTE	20	ELMER, JOSEPH N.	22	BRYSON, JOHN	
HULLINGER,GARY	13	WNUKOWSKI, BOB	28	CARAWAY, BYRON	
WILLIAMS, E.A. "RICO"	18	KIRK, DAVID	15	CHAPPELL, DOUG	
CARR, TOM	10	CRAIG, JAMES K.	13	CLIKSCALE, BERNARD	
NORRIS, JENNIFER R.	19	GREER, GORDON K.	12	COOLEY, TAMARA	
MCGREGOR, BENNY W.	18	MCCAULEY, BOB	7	COUNTS, JERMAINE	
BANISTER, W. A "AL"	29	WARD, DONALD C.	18	COX, AUDREY	
BATSON, DREUGH H.	28	LAWERENCE, STEWARD	7	CRAIG, JAMES	
MCALISTER, L.T. "LANNY"	13	BANISTER, W.A. "AL"	30	CROTTS, MICHAEL	
BLACK, PAUL E.	16	BROWN, FRANKIE	9	DENDY, DAVID	
THOMASON, JOE D.	23	MEEKINS, JAMES W.	23	EDENS, CHARLES	
MACMILLAN, DOUG	6	MACMILLAN, DOUG	7	EDWARDS, WILLIAM	
GREER, GORDON	11	CROTTS, MICHAEL	10	ELMER, JOESPH	
KIRK, DAVID	14	RODRIGUEZ, HECTOR	15	FAY, HARRY	
MEEKINS, JAMES W.	22	COX, AUDREY L.	11	GAFFNEY, SEAN	
LAFOY, RANDY	33	MARTIN, DANIEL L.	21	GARFIELD, KENNETH	
CRAIG, JAMES	12	HOLTZ, THOMAS D.	16	GEYER, JIM	
CROTTS, MICHAEL	9	GARFIELD, KEN	6	GOODLET, DANIEL	
BARKSDALE, ANDREW	7	ALLISON, DAVID	6	GREER, GORDON	
COX, AUDREY L.	10	BROWN, STEVE	11	GRISSFT, LAMONT	
MCCAULEY, BOB	6	MCDAVID, ANTHONY	14	HARDEN, ALLAN	
EDENS, CHARLES A.	9	BATSON, DREUGH H.	29	HARRIS, JOHNATHAN (JOHN) W	
LAWERENCE, STEWARD	6	RATTEREE, JAY	5	HAYWOOD, KIMBERLY	
BARRON, BRAD	9	EDWARDS, W. MACK	39	HENDRICKS, CHADWICK	
EDWARDS, W. MACK	43	AHART, HARVEY	7	HOLTZ, THOMAS	
BRYSON, JOHN W.	8	LAFOY, RANDY	37	HULLINGER, GARY EUGENE	
MUHAMMAD, LATEEF S.	7	FAY, HARRY	7	JACQUES, FRANKLIN DENNIS	
MCDAVID, ANTHONY L.	13	BRYSON, JOHN W.	9	JONES, JAKIA KESHON	
MARTIN, DANIEL L.	20	ARNOLD, SIGMUND	6	KINZER, ANDREW	
HAYWOOD, KIMBERLY W.	18	EDENS, CHARLES	10	KIRK, DAVID C.	
ALLISON, DAVID	5	MUHAMMAD, LATEEF S.	8	LAFOY, RANDY	
GARFIELD, KEN	5	BOOKER, J.C.	7	LAWRENCE, STEWARD	
ARNOLD, SIGMUND	5	HARDEN, ALLAN	5	LINDER, TIM	
BOOKER, JC	6	BONADIO, WES	6	MACMILLIAN, DOUG	
SOLESBEE, JIM	5	SOLESBEE, JIM	6	MANGRUM, AUBREY	
WILLIAMS, LARRY E.	17	BATES, FRED	16	MANGRUM , ROBERT JR.	
WATSON, GREGORY	7	GEYER, JIM	5	MARTIN, DANIEL	
FAY, HARRY	6	WILLIAMS, JOHN	5	MARTIN, RAY	
RATTEREE, JAY	4	SIMS, CALVIN	5	MCCAULEY, ROBERT JR	
HARDEN, ALLAN	4	WILLIAMS, LARRY	1	MCDAVID, ANTHONY	
GEYER, JIM D.	4	MARTIN, RAY L.	4	MCGREGOR, BENNY	
WILLIAMS, JOHN	4	MANGRUM, ROBERT E. JR.	4	MEEKINS, JAMES, W	
HOLTZ, THOMAS	3	SLOAN, T.R	3	MISZTAL, BOBBY	
WELLS, ANTHONY D.	3	WILLIS, TAMMY D.	3	MUHAMMAD, LATEEF	
MANGRUM, ROBERT E. JR.	3	BENNETT, JOSEPH	3	MURCHISON, JASON	
MARTIN, RAY L.	3	HENDRICK, CHADWICK F.	3	NORRIS, JENNIFER	
SLOAN, T.R.	2	O'CONNELL, SEAN A.	1	O'CONNELL, SEAN A.	
CHILDRESS,JERRY	3	MAZZOLI, ROBERT	1	PELANDA, KEN	
COUNTS, JERMAINE	2	GRISSETT, LAMONT	1	RAMSEY, MICHAEL	
WILLIAMS, JONATHAN E.	2	SYNDER, KENDRA	1	RATTERREE, JAY	
WILLIS, TAMMY	2	COOLEY, TAMARA	1	RICHARDSON, JOSEPH	
HENDRICK, CHADWICK F.	2	CALHOUN, NATAMBU	1	RICHBURG, AMINAH	
RAMSEY, MICHAEL	2	RICHBURG, AMINAH	2	ROBINSON, EDWARD MILTON	
TERRY, RODERICK K.	1			RODRIQUEZ, HECTOR	
HARRIS, NASHUN L.	1			SIMS, CALVIN	
HOUSTON, MICHAEL	1			SLOAN T.R. JR.	
O'CONNELL, SEAN A.	1			SNYDER, KENDRA JANELLE	
BENNETT, BYRON W.	1			SOLESBEE, JAMES	
RICHBURG, AMINAH	1			VICK, DONNIE RAY	
				WARD, DONALD CLEVELAND	
				WALTER, TIMOTHY C	
				WILLIAMS, CAL	
				WILLIAMS, E.A.	
				WILLIAMS, JOHN	
				WNUKOWSKI, ROBERT (BOB) C.	
				WORKMAN, GERARD ANTHONY	

10. Please provide the first and last names of all males that are members of the SCBOA District I from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District 1 that is grouped by gender, age, or experience. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each officials by name, district, years of experience, and rating. The defendant, SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled 045-075). Again, these rankings would provide the first and last names of all SCBOA District I officials for 2013-2016, from which their gender could be gleaned.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED
PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT
Information Gleaned - Accepted

2013-2014 Official Names District I	Years of Experience
LINDER, TIM T.	18
WARD, DONALD C.	16
ELMER, JOSEPH N.	21
COURTRIGHT, SCOTTY	39
BROWN,KEVIN	14
PELANDA, KEN B.	13
BROWN, FRANKIE	8
CHAPPELL, DOUG B.	13
RODRIGUEZ, HECTOR	14
DENDY, DAVID	27
CARAWAY, JOHN	14
WESTFIELD, EVERETTE	20
HULLINGER,GARY	13
WILLIAMS, E.A. "RICO"	18
CARR, TOM	10
NORRIS, JENNIFER R.	19
MCGREGOR, BENNY W.	18
BANISTER, W. A "AL"	29
BATSON, DREUGH H.	28
MCALISTER, L.T. "LANNY"	13
BLACK, PAUL E.	16
THOMASON, JOE D.	23
MACMILLAN, DOUG	6
GREER, GORDON	11
KIRK, DAVID	14
MEEKINS, JAMES W.	22
LAFOY, RANDY	33
CRAIG, JAMES	12
CROTTS, MICHAEL	9
BARKSDALE, ANDREW	7
COX, AUDREY L.	10
MCCAULEY, BOB	6
EDENS, CHARLES A.	9
LAWERENCE, STEWARD	6
BARRON, BRAD	9
EDWARDS, W. MACK	43
BRYSON, JOHN W.	8
MUHAMMAD, LATEEF S.	7
MCDAVID, ANTHONY L.	13
MARTIN, DANIEL L.	20
HAYWOOD, KIMBERLY W.	18
ALLISON, DAVID	5
GARFIELD, KEN	5
ARNOLD, SIGMUND	5
BOOKER, JC	6
SOLESBEE, JIM	5
WILLIAMS, LARRY E.	17
WATSON, GREGORY	7
FAY, HARRY	6
RATTEREE, JAY	4
HARDEN, ALLAN	4
GEYER, JIM D.	4
WILLIAMS, JOHN	4
HOLTZ, THOMAS	3
WELLS, ANTHONY D.	3
MANGRUM, ROBERT E. JR.	3
MARTIN, RAY L.	3
SLOAN, T.R.	2
CHILDRESS,JERRY	3
COUNTS, JERMAINE	2
WILLIAMS, JONATHAN E.	2
WILLIS, TAMMY	2
HENDRICK, CHADWICK F.	2
RAMSEY, MICHAEL	2
TERRY, RODERICK K.	1
HARRIS, NASHUN L.	1
HOUSTON, MICHAEL	1
O'CONNELL, SEAN A.	1
BENNETT, BYRON W.	1
RICHBURG, AMINAH	1

2014-2015 Official Names District I	Years of Experience
DENDY, DAVID	29
BROWN, KEVIN	15
LINDER, TIM T.	20
PELANDA, KEN B.	14
CHAPPELL, DOUG B.	14
NORRIS, JENNIFER	20
COURTRIGHT, SCOTTY	40
HULLINGER, GARY	16
CARAWAY, JOHN B. JR.	15
WILLIAMS, E.A. "RICO"	20
MCGREGOR, BENNY W.	19
ELMER, JOSEPH N.	22
WNUKOWSKI, BOB	28
KIRK, DAVID	15
CRAIG, JAMES K.	13
GREER, GORDON K.	12
MCCAULEY, BOB	7
WARD, DONALD C.	18
LAWERENCE, STEWARD	7
BANISTER, W.A. "AL"	30
BROWN, FRANKIE	9
MEEKINS, JAMES W.	23
MACMILLAN, DOUG	7
CROTTS, MICHAEL	10
RODRIGUEZ, HECTOR	15
COX, AUDREY L.	11
MARTIN, DANIEL L.	21
HOLTZ, THOMAS D.	16
GARFIELD, KEN	6
ALLISON, DAVID	6
BROWN, STEVE	11
MCDAVID, ANTHONY	14
BATSON, DREUGH H.	29
RATTEREE, JAY	5
EDWARDS, W. MACK	39
AHART, HARVEY	7
LAFOY, RANDY	37
FAY, HARRY	7
BRYSON, JOHN W.	9
ARNOLD, SIGMUND	6
EDENS, CHARLES	10
MUHAMMAD, LATEEF S.	8
BOOKER, J.C.	7
HARDEN, ALLAN	5
BONADIO, WES	6
SOLESBEE, JIM	6
BATES, FRED	16
GEYER, JIM	5
WILLIAMS, JOHN	5
SIMS, CALVIN	5
WILLIAMS, LARRY	1
MARTIN, RAY L.	4
MANGRUM, ROBERT E. JR.	4
SLOAN, T.R	3
WILLIS, TAMMY D.	3
BENNETT, JOSEPH	3
HENDRICK, CHADWICK F.	3
O'CONNELL, SEAN A.	1
MAZZOLI, ROBERT	1
GRISSETT, LAMONT	1
SYNDER, KENDRA	1
COOLEY, TAMARA	1
CALHOUN, NATAMBU	1
RICHBURG, AMINAH	2

2015-2016 Official Names District I	Years of Experience
AHART, HARVEY JR	
ALLISON, DAVID KENNEDY	
ARNOLD, SIGMUND	
BANISTER, WILLIAM	
BATSON, DREUGH	
BLACK, PAUL	
BLACK, ROBERT	
BLUE, TRAVIS	
BOOKER, J.C.	
BRITT, THOMAS	
BROWN, KEVIN	
BRYSON, JOHN	
CARAWAY, BYRON	
CHAPPELL, DOUG	
CLIKSCALE, BERNARD	
COOLEY; TAMARA	
COUNTS, JERMAINE	
COX, AUDREY	
CRAIG, JAMES	
CROTTS, MICHAEL	
DENDY, DAVID	
EDENS, CHARLES	
EDWARDS, WILLIAM	
ELMER, JOESPH	
FAY, HARRY	
GAFFNEY, SEAN	
GARFIELD, KENNETH	
GEYER, JIM	
GOODLET, DANIEL	
GREER, GORDON	
GRISSET, LAMONT	
HARDEN, ALLAN	
HARRIS, JOHNATHAN (JOHN) W	
HAYWOOD, KIMBERLY	
HENDRICKS, CHADWICK	
HOLTZ, THOMAS	
HULLINGER, GARY EUGENE	
JACQUES, FRANKLIN DENNIS	
JONES, JAKIA KESHON	
KINZER, ANDREW	
KIRK, DAVID C.	
LAFOY, RANDY	
LAWRENCE, STEWARD	
LINDER, TIM	
MACMILLIAN, DOUG	
MANGRUM, AUBREY	
MANGRUM , ROBERT JR.	
MARTIN, DANIEL	
MARTIN, RAY	
MCCAULEY, ROBERT JR	
MCDAVID, ANTHONY	
MCGREGOR, BENNY	
MEEKINS, JAMES, W	
MISZTAL, BOBBY	
MUHAMMAD, LATEEF	
MURCHISON, JASON	
NORRIS, JENNIFER	
O'CONNELL, SEAN A.	
PELANDA, KEN	
RAMSEY, MICHAEL	
RATTERREE, JAY	
RICHARDSON, JOSEPH	
RICHBURG, AMINAH	
ROBINSON, EDWARD MILTON	
RODRIQUEZ, HECTOR	
SIMS, CALVIN	
SLOAN T.R. JR.	
SNYDER, KENDRA JANELLE	
SOLESBEE, JAMES	
VICK, DONNIE RAY	
WARD, DONALD CLEVELAND	
WALTER, TIMOTHY C	
WILLIAMS, CAL	
WILLIAMS, E.A.	
WILLIAMS, JOHN	
WNUKOWSKI, ROBERT (BOB) C.	
WORKMAN, GERARD ANTHONY	

11. Please provide the ages of all SCBOA District I members along with first and last name from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District I that is organized by age.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT

The Plaintiff communicated that the Defendants termination of her membership and communication that future membership WILL NOT be accepted is based on a future of twenty five years according to the age of elder basketball officials compared to the Plaintiff for relief of loss of assignment of basketball games for twenty-five years through the SCHSL, E.A. Williams assigned games and E. A. Williams Tournaments.

12. Please provide the years of experience of all SCBOA District I members from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, South Carolina High School League, would state that it is not in possession of a listing of all members of the SCBOA District 1 that is grouped by gender, age, or experience. However, the defendant, SCHSL, has previously produced the ranking of all SCBOA officials for the 2015-2016 school year (labeled SCHSL 22-36). This list identifies each officials by name, district, years of experience, and rating. The defendant, SCHSL, herewith is producing the ranking of all SCBOA officials for the 2013-2014 school year and the 2014-2015 school year (labeled 045-075). Again, these rankings would provide the years of experience of all SCBOA District I officials for 2013-2016.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT - Accepted

2013-2014 Official Names District I	Years of Experience
LINDER, TIM T.	18
WARD, DONALD C.	16
ELMER, JOSEPH N.	21
COURTRIGHT, SCOTTY	39
BROWN,KEVIN	14
PELANDA, KEN B.	13
BROWN, FRANKIE	8
CHAPPELL, DOUG B.	13
RODRIGUEZ, HECTOR	14
DENDY, DAVID	27
CARAWAY, JOHN	14
WESTFIELD, EVERETTE	20
HULLINGER,GARY	13
WILLIAMS, E.A. "RICO"	18
CARR, TOM	10
NORRIS, JENNIFER R.	19
MCGREGOR, BENNY W.	18
BANISTER, W. A "AL"	29
BATSON, DREUGH H.	28
MCALISTER, L.T. "LANNY"	13
BLACK, PAUL E.	16
THOMASON, JOE D.	23
MACMILLAN, DOUG	6
GREER, GORDON	11
KIRK, DAVID	14
MEEKINS, JAMES W.	22
LAFOY, RANDY	33
CRAIG, JAMES	12
CROTTS, MICHAEL	9
BARKSDALE, ANDREW	7
COX, AUDREY L.	10
MCCAULEY, BOB	6
EDENS, CHARLES A.	9
LAWERENCE, STEWARD	6
BARRON, BRAD	9
EDWARDS, W. MACK	43
BRYSON, JOHN W.	8
MUHAMMAD, LATEEF S.	7
MCDAVID, ANTHONY L.	13
MARTIN, DANIEL L.	20
HAYWOOD, KIMBERLY W.	18
ALLISON, DAVID	5
GARFIELD, KEN	5
ARNOLD, SIGMUND	5
BOOKER, JC	6
SOLESBEE, JIM	5
WILLIAMS, LARRY E.	17
WATSON, GREGORY	7
FAY, HARRY	6
RATTEREE, JAY	4
HARDEN, ALLAN	4
GEYER, JIM D.	4
WILLIAMS, JOHN	4
HOLTZ, THOMAS	3
WELLS, ANTHONY O.	3
MANGRUM, ROBERT E. JR.	3
MARTIN, RAY L.	3
SLOAN, T.R.	2
CHILDRESS,JERRY	3
COUNTS, JERMAINE	2
WILLIAMS, JONATHAN E.	2
WILLIS, TAMMY	2
HENDRICK, CHADWICK F.	2
RAMSEY, MICHAEL	2
TERRY, RODERICK K.	1
HARRIS, NASHUN L.	1
HOUSTON, MICHAEL	1
O'CONNELL, SEAN A.	1
BENNETT, BYRON W.	1
RICHBURG, AMINAH	1

2014-2015 Official Names District I	Years of Experience
DENDY, DAVID	29
BROWN, KEVIN	15
LINDER, TIM T.	20
PELANDA, KEN B.	14
CHAPPELL, DOUG B.	14
NORRIS, JENNIFER	20
COURTRIGHT, SCOTTY	40
HULLINGER, GARY	16
CARAWAY, JOHN B. JR.	15
WILLIAMS, E.A. "RICO"	20
MCGREGOR, BENNY W.	19
ELMER, JOSEPH N.	22
WNUKOWSKI, BOB	28
KIRK, DAVID	15
CRAIG, JAMES K.	13
GREER, GORDON K.	12
MCCAULEY, BOB	7
WARD, DONALD C.	18
LAWERENCE, STEWARD	7
BANISTER, W.A. "AL"	30
BROWN, FRANKIE	9
MEEKINS, JAMES W.	23
MACMILLAN, DOUG	7
CROTTS, MICHAEL	10
RODRIGUEZ, HECTOR	15
COX, AUDREY L.	11
MARTIN, DANIEL L.	21
HOLTZ, THOMAS D.	16
GARFIELD, KEN	6
ALLISON, DAVID	6
BROWN, STEVE	11
MCDAVID, ANTHONY	14
BATSON, DREUGH H.	29
RATTEREE, JAY	5
EDWARDS, W. MACK	39
AHART, HARVEY	7
LAFOY, RANDY	37
FAY, HARRY	7
BRYSON, JOHN W.	9
ARNOLD, SIGMUND	6
EDENS, CHARLES	10
MUHAMMAD, LATEEF S.	8
BOOKER, J.C.	7
HARDEN, ALLAN	5
BONADIO, WES	6
SOLESBEE, JIM	6
BATES, FRED	16
GEYER, JIM	5
WILLIAMS, JOHN	5
SIMS, CALVIN	5
WILLIAMS, LARRY	1
MARTIN, RAY L.	4
MANGRUM, ROBERT E. JR.	4
SLOAN, T.R	3
WILLIS, TAMMY D.	3
BENNETT, JOSEPH	3
HENDRICK, CHADWICK F.	3
O'CONNELL, SEAN A.	1
MAZZOLI, ROBERT	1
GRISSETT, LAMONT	1
SYNDER, KENDRA	1
COOLEY, TAMARA	1
CALHOUN, NATAMBU	1
RICHBURG, AMINAH	2

2015-2016 Official Names District I	Years of Experience
AHART, HARVEY JR	
ALLISON, DAVID KENNEDY	
ARNOLD, SIGMUND	
BANISTER, WILLIAM	
BATSON, DREUGH	
BLACK, PAUL	
BLACK, ROBERT	
BLUE, TRAVIS	
BOOKER, J.C.	
BRITT, THOMAS	
BROWN, KEVIN	
BRYSON, JOHN	
CARAWAY, BYRON	
CHAPPELL, DOUG	
CLIKSCALE, BERNARD	
COOLEY, TAMARA	
COUNTS, JERMAINE	
COX, AUDREY	
CRAIG, JAMES	
CROTTS, MICHAEL	
DENDY, DAVID	
EDENS, CHARLES	
EDWARDS, WILLIAM	
ELMER, JOESPH	
FAY, HARRY	
GAFFNEY, SEAN	
GARFIELD, KENNETH	
GEYER, JIM	
GGOULET, DANIEL	
GREER, GORDON	
GRISSET, LAMONT	
HARDEN, ALLAN	
HARRIS, JOHNATHAN (JOHN) W	
HAYWOOD, KIMBERLY	
HENDRICKS, CHADWICK	
HOLTZ, THOMAS	
HULLINGER, GARY EUGENE	
JACQUES, FRANKLIN DENNIS	
JONES, JAKIA KESHON	
KINZER, ANDREW	
KIRK, DAVID C.	
LAFOY, RANDY	
LAWRENCE, STEWARD	
LINDER, TIM	
MACMILLIAN, DOUG	
MANGRUM, AUBREY	
MANGRUM , ROBERT JR.	
MARTIN, DANIEL	
MARTIN, RAY	
MCCAULEY, ROBERT JR	
MCDAVID, ANTHONY	
MCGREGOR, BENNY	
MEEKINS, JAMES, W	
MISZTAL, BOBBY	
MUHAMMAD, LATEEF	
MURCHISON, JASON	
NORRIS, JENNIFER	
O'CONNELL, SEAN A.	
PELANDA, KEN	
RAMSEY, MICHAEL	
RATTERREE, JAY	
RICHARDSON, JOSEPH	
RICHBURG, AMINAH	
ROBINSON, EDWARD MILTON	
RODRIQUEZ, HECTOR	
SIMS, CALVIN	
SLOAN T.R. JR.	
SNYDER, KENDRA JANELLE	
SOLESBEE, JAMES	
VICK, DONNIE RAY	
WARD, DONALD CLEVELAND	
WALTER, TIMOTHY C	
WILLIAMS, CAL	
WILLIAMS, E.A.	
WILLIAMS, JOHN	
WNUKOWSKI, ROBERT (BOB) C.	
WORKMAN, GERARD ANTHONY	

13. Please provide Training and Contract Documentation for District I Director, E.A. "Rico" Williams especially with regard to proper communication, confidentiality, grounds to terminate officials, sexual harassment, leadership, and solicitation from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad, vague and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, would not have access to this information and is therefore not in possession of any documents responsive to this request.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT
The Plaintiff seeks discovery to determine the grounds for her termination and training provided to District Director's to justify behavior and communication of the Basketball directors.

14. Please provide Training and Contract Documentation for all South Carolina High School League Officials involved in this case especially with regard to SCHSL/SCBOA By-laws, Constitution, State of South Carolina operation requirements, proper communication, grounds to terminate officials, sexual harassment, confidentiality, leadership and solicitation from 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad, vague and not proportional to the needs of the case. Not waving this objection, the defendant, SCHSL, is hereby producing the SCBOA Directory for the 2015-2016 school year (labeled SCHSL 076-100), which includes the SCBOA's Constitution and other rules.

RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT
The Plaintiff seeks discovery to determine the grounds for her termination and training provided to South Carolina High School League officials to justify their behavior and communication.

15. Please provide the names and addresses of the supervising/ governing board members of the South Carolina High School League for 2013-2016.

RESPONSE: Sowell Gray Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201.

The defendant, South Carolina High School League objects to this Interrogatory on the grounds that it is overbroad and not proportional to the needs of the case. Not waiving this objection, the defendant, SCHSL, is hereby producing a document that provides the names of the governing board members of the South Carolina High School League that would include the years 2013-2016 (labeled SCHSL 101-105).

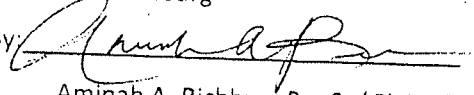
RESPONSE: Turner Padget, 200 East Broad Street, Suite 250, Greenville, South Carolina 29601
NO RESPONSE PROVIDED

PLAINTIFF – WHY INFORMATION/DOCUMENTATION SOUGHT - Accepted

These Interrogatories shall be deemed continuing so as to require supplemental responses prior to trial.

Respectfully submitted,

Aminah A. Richburg

By: 

Aminah A. Richburg Pro Se/ Plaintiff
217 Plum Creek Lane
Greenville, South Carolina 29607
864-419-6707

Plaintiff/ Pro Se, Aminah A. Richburg

Greenville, South Carolina
January 13, 2017

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	
Plaintiff	)	**MEMORANDUM IN SUPPORT OF MOTION TO DISMISS PROTECTIVE ORDER, REVERSAL OF COURT PROTECTION ORDER**
	)	
vs.	)	
	)	
E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE	)	
Defendants	)	

FILED
GREENVILLE CO. S.C.
PAUL E. WICKENSIMER
2017 JAN 18 PM 3 44

The Plaintiff, Aminah A. Richburg Pro Se, hereby submits a Memorandum in support of its Motion for Reversal for the Protective Order granted by the court or dismissal of the Protective Order, pursuant to Rule 26 of the South Carolina Rules of Civil Procedure. As set forth more fully below, the Plaintiff's Motion should be granted.

PROCEDURAL BACKGROUND

The plaintiff filed this lawsuit on March 31, 2016. The allegation and claims arise out of a dispute between the Plaintiff and the defendants, E.A. "Rico" Williams, Director of District One of the South Carolina Basketball Officials Association (SCBOA) and the South Carolina High School League that began on February 9, 2016.

- The Plaintiff officiated basketball games for the Defendant E.A. Rico Williams business at Furman University on February 4, 2016 at 6:00PM, 7:00 PM and 8:00 PM(00004-00005 Williams). On February 6, 2016, the Plaintiff officiated basketball games at a Boys Junior Varsity Tournament at 4:00 PM, 5:00 PM and 6:00 PM for SCHSL/SCBOA District I.
- On Tuesday, February 9, 2016 the Plaintiff became aware of the email sent by E.A. Williams on February 5, 2016, and forwarded the email to Defendant, Mr. Skip Lax, South Carolina Basketball Commissioner for the South Carolina High School League, asking for assistance with the matter. The Defendant, Mr. Lax responded to the Plaintiff and communicated that her concerns were a local matter to be handled at the district level.

upper state finals this weekend. If I do, I will be at all games. I will be in the officials' suite. I would love to sit down and talk to you. Joedy".

- On Wednesday, February 24, 2016 the Plaintiff responded to the Defendant, Mr. Joedy Moots, "I appreciate your honesty, I will not seek officiating opportunities in a different district because I work and live in the Greenville Area and the distance required to officiate nearby counties will be burdensome. I will pay my registration for District One as I have for the past three years. Rico is an ignorant man and he displayed his lack of professionalism and leadership ability as the District One Director. Aminah Richburg".
- On March 11, 2016 at 10:42 AM the Plaintiff received a message from Mark Turner requesting her membership with YBOA for future Basketball Tournaments.
- The Plaintiff delivered the information on March 11, 2016 at 11:22 AM.
- On March 11, 2016 at 12:54 PM the Plaintiff received a message from Deitrick and Malvaree of Charleston Whistleblowers Officials requesting that the Plaintiff forwarded verification of registration for their files.
- On March 11, 2016 at 1:49 PM, the Plaintiff sent the information to Dietrick and Malvaree of the Charleston Whistleblowers Officials.
- On March 11, 2016 at 6:09 PM Dietrick and Malvaree of the Charleston Whistleblowers acknowledged receipt of the information sent by the Plaintiff.
- On March 16, 2016 at 9:51PM the Plaintiff received the following message from Dietrick and Melvaree, "Good Evening Aminah, after a lengthy discussion and insight from YBOA organizers, we are unable to schedule you any assignments through Charleston Whistleblowers Basketball Officials. We apologize for any inconvenience, however feel free to contact the National Headquarters at 407-363-9262 and request a refund. Sincerely, Dietrick & Melvaree.
- On March 24, 2016, the Plaintiff received a certified letter dated March 22, 2016, from the Defendant, Mr. E.A. Rico Williams on SCBOA District One Letter Head, communicating that the SC Basketball Officials Association District One Board of Directors met on February 29th to discuss several issues including your present position within our District. In a February 25th email I invited you to meet with our Board of Directors to discuss any grievances or concerns that you may have. (The Plaintiff did not see the communication and did not anticipate a communication from the Defendant, Mr. E.A. Rico Williams). Previously, the Defendant, Mr. E.A. Rico Williams communicated in an email read by the Plaintiff on February 9, 2016, "But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District I member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", declining standards", etc., it is obvious that you feel your

- On February 11, 2016 the Plaintiff communicated that she would seek legal counsel for her pain and suffering based on the lack of support communicated by the Defendant, Mr. Skip Lax, South Carolina Basketball Commissioner, and SCBOA District I.
- On February 16, 2016, the Plaintiff sought assistance from Defendant, Mr. Joedy Moots, the Officials Representative for the South Carolina Basketball Officials Association by forwarding the email sent to her from the Defendant, E.A. Rico Williams and communicated that he was listed as the Officials Representative, please advise on this matter.
- On February 17, 2016 at 10:43 a.m. the Plaintiff sent another email to the Defendant, Mr. Joedy Moots, the Officials Representative for the South Carolina Basketball Officials Association, because he did not respond to the email sent on February 16, 2017.
- The Defendant, Mr. Joedy Moots, the Officials Representative for the South Carolina Basketball Officials Association responded, "I received your email. I have been in district meetings the past two days. I will review what you sent and get back with you by tomorrow.
- The Plaintiff sent another message to the Defendant, Mr. Joedy Moots on February 17, 2016, thanking him for his response.
- On February 22, 2016 at 9:21 AM, the Defendant, Mr. Joedy Moots, the Officials Representative for the South Carolina Basketball Officials Association, reviewed the email sent and gave feedback.
- On February 23, 2016, at 5:05 PM, the Plaintiff sent an email message to the Defendant, Mr. Joedy Moots based on his review and feedback.
- On February 23, 2016 at 5:37 PM, the Defendant, Mr. Joedy Moots, the Officials Representative for the South Carolina Basketball Officials Association wrote "Aminah, You are correct, I only went on what was said in the emails and the text. I didn't mean you were insubordinate but that if one of my staff talked to me like that, I would consider it insubordination. Believe me, the basketball directors and I have gotten into many disagreements because I am always taking up for my officials. But you can't win an argument with your director because they have too much power within the organization. You have to find a way to get along. Like I said, I have no knowledge of your officiating ability. I can definitely see there is a personality conflict and the best thing you can do is go to a different district. If I were you, in a respectful way, I would ask him to elaborate on his accusations about schools and officials marking you off. You seem like an extremely intelligent young lady and I hope you stick with officiating because we need more females in sports. I really can't help you with Rico. But if there is anything I can do for you, I would gladly help. I am hoping I get assigned the

membership is not being served adequately by the "present leadership. I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route you deem favorable)" (00004-00005 Williams), this communication did not support or communicate an opportunity for the Plaintiff to discuss any grievance or concern. The letter sent by the Defendant, E.A. Rico Williams communicated falsehoods concerning the Plaintiff's position with the District I SCBOA Director, Mr. Joedy Moots and local and state leadership. The conclusion of the letter stated that after a vote by District One Board of Directors it has been determined that if there is any intent of the Plaintiff to apply for future membership in District One, the Plaintiff's application will not be accepted.

The Defendant, the SCHSL had a duty to oversee the actions of the Defendant, E.A. Rico Williams according to the South Carolina Basketball Officials Association Constitution and By-Laws. (SCHSL 076-100). Furthermore, Defendant, E.A. Rico Williams and the SCBOA District I Board of Directors had no grounds to terminate the membership of the Plaintiff with SCBOA District I (SCHSL 076-100), (Williams 00002-00003).The Plaintiff did not violate the Constitution or By-Laws set by the South Carolina Basketball Officials Association 2015-2016 (SCHSL 076-100) , (Williams 00002-00003). The Plaintiff abided by the SCBOA District I Contract signed on 10/24/14 (Williams00003) and the Code of Ethics (Williams 00002) and received a game schedule and had no issues for any basketball games on record for the 2015-2016 school year. The Defendant E.A. Williams and the Defendant, the SCHSL committed actionable torts against the plaintiff.

With respect to the pending motion, the two schools that blocked the Plaintiff provided by the Defendant, the SCHSL according the Defendant E.A. Rico Williams, through Michael Montgomery was the school were the Plaintiff graduated from and the school in close proximity to where she lives, entered by the Plaintiff only.

The Plaintiff served Sarah Hurley with a Second Set of Interrogatories and she has not responded and has not appropriately responded to the First Set of Interrogatories. The Plaintiff needs clarity to the Responses of the 1st and 2nd Interrogatories and the lack of cooperation from Sarah Hurley by providing requested information. The information provided under the protection order, does it represent both Defendants, E.A. Rico Williams and the South Carolina High School League or will the attorneys respond separately.

The Defendant the South Carolina High School League sent the names of schools and names of the officials and communicated that these names would not necessarily be the ones referenced in Mr. William's email of February 5, 2016, as these names have only been entered in the Arbiter system used to schedule varsity contest.

The ten names of basketball officials that blocked the Plaintiff provided by the Defendant SCHSL communicated by the Defendant E.A. Rico Williams on February 5, 2016, out of the ten names of basketball officials that blocked the Plaintiff, seven of the named basketball officials have never officiated games with the Plaintiff (00022-00032 Williams).

Seven of the named basketball officials that blocked the Plaintiff communicated by Defendant, E.A. Rico Williams on February 5, 2016, are not members of South Carolina Basketball Officials Association and are not represented in any Basketball district in the State of South Carolina (SCHSL 045-075).

Only one basketball officials block was entered against the Plaintiff in the Arbiter System as of February 5, 2016 communicated by the Defendant E.A. Rico Williams and later communicated by Michael Montgomery and that block is questionable, the date is November 4, 2015.

Due to the falsity of the officials communicated by the Defendant E.A. Rico Williams and the flippant response from the Defendant the High School League regarding the information disclosed, the validity and reliability of the information is questionable and any other names submitted are falsely created to this case.

If or when the Defendant E.A. Rico Williams creates another listing of basketball officials generated through any of his false sources even those created in Arbiter the information must not be honored.

Eight of the basketball officials blocks communicated by the Defendant E.A. Williams against the Plaintiff as of February 5, 2016 and reported by SCHSL Michael Montgomery were dated as follows in the year 2016 – July 12, 2016, July 13, 2016, July 24, 2016, July 30, 2016, August 1, 2016, August 3, 2016, August 11, 2016, October 8, 2016.

One of the basketball official blocks against the Plaintiff communicated by Defendant, E.A. Williams on February 5, 2016 was listed on January 2, 2016 and that name is not a member of the South Carolina Basketball Association (SCHSL 045-075). This information alone reveals the actionable torts performed by the Defendants E.A. Rico Williams and the South Carolina High School League. E.A. Rico Williams and the South Carolina High

School league must be compelled to provide all interrogatory disclosure without a protection order for the present practice has embellished falsehood.

ANALYSIS

Under Rule 26(c), SCRCP, a party from whom discovery is sought ,for good cause shown, may be entitled to an order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden by expense, including one or more of the following: (1) that the discovery not be had; (2) that the discovery may be had only on specified terms and conditions, including a designation of the time or place; (3) that the discovery may be had only by a method of discovery other than selected by the party seeking discovery; (4) that certain matters not be inquired into or that the scope of the discovery be limited to certain matters; (5) that discovery be conducted with no one present except persons designated by the court; (7) that a trade secret or other confidential research, development, or commercial information not be disclosed or be disclosed only in a designated way; or (8) that the parties simultaneously file specified documents or information enclosed in sealed envelopes to be opened as directed by the court.

In this case, the Plaintiff must be entitled to receive in discovery all information sought in discovery and none of the documents should fall under the hospices of a Protection Order as communicated by the Defendants E.A. Rico Williams and the Defendant the South Carolina High School League.

The Plaintiff alleges that the Defendant, E.A. Rico Williams created a false narrative about the Plaintiff in an email sent to the Defendant, South Carolina High School League representatives on February 5, 2016, and the Defendant, South Carolina High School League Representatives supported the Defendant E.A. Rico Williams false narrative through their actions.

The false information and false narratives were brought to the attention of the SCBOA District One Board of Directors, and the falsehoods communicated by Defendant E.A. Rico Williams and the Defendant, South Carolina High School League Representatives influenced SCBOA District One Board Members as well as members of the Charleston Whistleblowers Basketball Officials and YBOA organizers when decisions were made either to terminate the Plaintiff's future membership in SCBOA District One and the inability of YBOA organizers and Charleston Whistleblowers Basketball officials to schedule any assignments for the Plaintiff.

The Plaintiff respectfully request that all information communicated in this case be shared to outside parties to this litigation to protect the interest of officials in the state of South Carolina in the future. The information presented will not affect future

relationship between schools and officials. The Plaintiff's complaint was based on her membership with the South Carolina Basketball Officials association only.

First, under oath, the Plaintiff communicated that she officiates other sports such as volleyball, football, softball and lacrosse. The Plaintiff never stated that her termination as a SCBOA District One membership would affect her membership with other sports organizations in the state of South Carolina.

The Plaintiff also communicated that she will not seek membership with other basketball districts in the state of South Carolina due to cumbersome nature of the affiliation.

The Defendant, E.A. Rico Williams initiated the dialogue by insinuating that a transfer to another basketball district that best suites the Plaintiff may be in order and concluded in his email communication on February 5, 2016 that he would facilitate the communication to any District in South Carolina (00005 Williams).

The discovery information does not support good will for the Defendants, only a cover-up so they can continue their practice of defamation, embarrassment, humiliation (Defendants recently sent Subpoena with the School District of Greenville County for all of the Plaintiff's employment records, irrelevant to this case) as well as recklessness and intentional disregard of the Plaintiff's rights and dignity as a human being in the pursuit of life and the pursuit of happiness.

The Defendants are misguiding their intentions for a protection order by communicating scenarios that are irrelevant to this case as well as falsehoods that are irrelevant as well.

Secondly, the plaintiff believes the Freedom of Information Act (FOIA), the South Carolina High School league is required to make public all affairs for review, and none of the material presented discloses trade secrets, competitive information or evaluation. The South Carolina High School League disclosure of information is not of a personal nature and public disclosure would not constitute an unreasonable invasion of privacy.

Thirdly, the Plaintiff's First and Second Set of Interrogatories are based on all statements communicated by the Defendant E. A. Rico Williams and the Defendant the South Carolina High School League used to blight, defame and distort the character and professionalism of the Plaintiff. The Defendant E.A. Rico Williams sent an email communication to Defendant, Skip Lax and initiated all of the false narrative statements as follows:

- "If you remember, last year during the JV tournament I asked you to wear your officials pants instead of those "jogging" pants whenever you're representing District One and you said you would (00004-5 Williams)"

- (00005 Williams)" I received requested information from Bob Wnkowski and Kevin Brown. From our records show you are marked off by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are officials at the Varsity Level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary"

- "Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non-required) scheduled meetings which began at 6pm and ended at 8 pm. You were present at the first meeting from beginning to end; a September 21 meeting you arrived at 7:35 pm; an October 19 meeting you arrived at 7:05 and a Nov. 2 meeting you arrived at 6:50pm. Therefore your meeting attendance equates to about 2 ½ meetings. In addition, you were absent from our required mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven meetings."

- "Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is and you will not be considered for any future assignments until your status as a District I member is reviewed by the Board of Directors"
- "Which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc., it is obvious that you feel your membership is not being served adequately by the present leadership".

- I and we certainly don't want any member to be so uncomfortable in our District therefore a transfer to another District that best suites you may be in order.

- As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route you deem favorable.

The Defendant has clearly created a false narrative to create a scenario that the Plaintiff is difficult to work with to support his position and his ideology based upon the communication stated by the Plaintiff. It was the Defendant only, E.A. Rico Williams that communicated a transfer to another district or any other district in the state of South Carolina.

On November 1, 2015 the Plaintiff responded to an email sent by the Defendant E.A. Rico Williams on October 27, 2015 at 6:43 PM, after checking our attendance records it has come to my attention that some officials have missed a number of meetings and may be in danger of failing certification. There are several reasons why these meetings may have been missed, and we are attempting to update our records along with what the State has on file. Please let me know of your intentions, whether it be to fulfil the obligations of an SCBOA member, or not officiate as a District I member at this time.

The Plaintiff responded on November 1, 2015 at 8:33 PM, "I have attended the SCHL mandatory meeting as well as three district meetings and the meeting change date earlier affected my scheduling. I took my exam early and I should not be held accountable for the meeting that was rescheduled.

The Defendant E.A. Rico Williams did not communicate anything about arrival times and stated that there are several reasons why these meetings may have been missed. The Defendant E.A. Rico Williams did not communicate after the Plaintiff's response, that she did not meet the required meetings and the Plaintiff received her first basketball assignment (Scrimmage) on November 10, 2015 and first paid game on December 2, 2015.

The Plaintiff communicated the following statements to Mr. E.A. Rico Williams as follows:

1. Please discontinue the harassing communications.
2. Previous District One leaders presented a higher level of professionalism which made officiating enjoyable, unfortunately the present leadership standards have declined.
3. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position with the SCHSL.
4. If I do not respond to a text or call, I am unavailable.
5. I confirmed my availability for Thursday earlier.
6. If you have games for me in the future I welcome any professional communication you send.
7. If I do not receive any game assignments, I will communicate my disdain to the South Carolina High School League

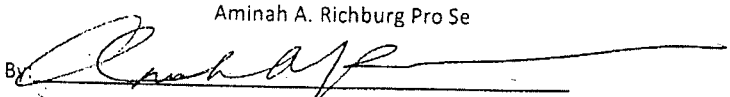
The standard for a Protective order requested by the Defendant, South Carolina High School League is not a "good cause" pursuant to Rule 26 (c) , the above cited sections of FOIA indicate that this information is subject to public disclosure and the

concerns for privacy, evaluation and competitive integrity do not support a Protective Order.

Accordingly, the Plaintiff, Aminah A. Richburg Pro Se, respectfully request that the Court reverse and terminate the Protective Order so the events that caused the Plaintiff to suffer damages from embarrassment; humiliation; mental suffering; lost earnings; loss of consortium, public ridicule, serial defamation, rejection, substantial injury to reputation, public avoidance would not happen to another official in the state of South Carolina.

Respectfully submitted

Aminah A. Richburg Pro Se

By: 

Aminah A. Richburg Pro Se
217 Plum Creek Lane
Greenville, SC 29607
(864) 419-6707

Greenville, South Carolina

January 17, 2017

Appellate Motion of March 6, 2017

Motions Provided Below

Appellate Challenge Respondent Rico Williams of March 6, 2017

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE)	
AMINAH A. RICHBURG)	
Plaintiff)	NOTICE TO DISMISS MOTION AND ALSO DISMISS FOR SUMMARY JUDGEMENT BY DEFENDANT E.A. "RICO" WILLIAMS
)	
v.)	
E.A. "RICO" WILLIAMS, DIRECTOR)	
DISTRICT ONE SC BASKETBALL)	
OFFICIALS ASSOCIATION AND THE)	
SOUTH CAROLINA HIGH SCHOOL)	
LEAGUE)	
)	
Defendants)	

FILED-CLERK OF COURT
PAUL B. WICKENSIMER
GREENVILLE CO. S.C.
2017 MAR -6 AM 11:32

TO: E.A. "RICO" WILLIAMS, DIRECTOR, DISTRICT ONE SOUTH CAROLINA BASKETBALL OFFICALS ASSOCIATION, AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, THE ABOVE-NAMED DEFENDANTS:

The Plaintiff, Aminah A. Richburg, herewith serves upon and request that the motion received by mail on February 27, 2017 by the Defendant E.A. "Rico" Williams, by and through his undersigned counsel be dismissed. The Plaintiff pleads with the court that the Complaint filed on March 31, 2016, is supported and substantiated with evidence that the Defendants actions initiated by E.A. Rico Williams caused damages and injuries to the Plaintiff. The Defendants acted with the course and scope of the organization with the knowledge, consent and approval and their conduct was ratified. In particular, at all times material hereto, defendants, individually and through their officers, directors, members, authorized the wrongful conduct alleged in this complaint, ratified said wrongful conduct and/or were personally guilty of defamation, malice, negligence and/or recklessness. The motion for an Order pursuant to rule 56 for summary judgement on the claim against E.A. "Rico" Williams must not be recognized or considered by the court in ten (10) days henceforth or as soon thereafter as counsel may be heard.

The motion requesting an Order pursuant to Rule 56 must be dismissed based on the grounds that the Plaintiff has a generated material facts to support her defamation claim against E.A. "Rico" Williams and the South Carolina High School League and all grounds are sustained. The Plaintiff has filed several motions to compel for discovery with the First and Second interrogatories, which the defendants undersigned counsel have failed repeatedly to produce.

The alleged truth communicated by E.A. "Rico" Williams that the alleged defamatory statements made by Defendant Williams were true based on his testimony and lack of documentation produced in the case, does not entitle Mr. E.A. Williams nor the South Carolina High School League to qualified privilege.

The motion presented along with the Affidavit of E.A. "Rico" Williams, Deposition Testimony of the Plaintiff by which the Plaintiff Requested Corrections, are not applicable to common and statutory law of South Carolina along with supporting Memorandum of Law.

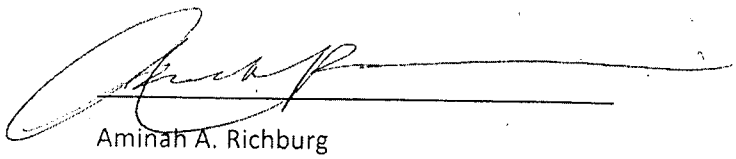
The Plaintiff pleads for empathy from the court. The Plaintiff has filed plenty of motions to compel the Defendants to provide discovery information with the First and Second Interrogatories submitted by the Plaintiff since October of 2016 and the Defendants have not cooperated by sending the documentation. The Plaintiff filed for the first Motion to Compel and once the hearing date was granted, the Defendants filed a motion for a Protection Order and the Motion originated by the Plaintiff was not addressed by the court during the hearing and the sitting judge did not have the proper documentation at the hearing for the Protection Order nor the Motion to Compel and asked for the submission of documents after the hearing. The Plaintiff asked if she could also submit a motion to dismiss the protection order and was told she could do so and that she was required to submit the document to the court and to the Defendants which she did. The court did not give an explanation as to why the Protection order was granted, only communicated that the Plaintiff did not e-file the documents. The Plaintiff has since then filed a motion to dismiss the Protection Order citing that she did not have the capabilities to E-file and furthermore she used the e-mail communication that is available to her.

Presently, the Plaintiff submitted another Motion to Compel and the hearing was communicated to take place on March 20, 2017 at 3:00 pm. The Defendants have submitted a motion as well to be heard on the same date and were granted a hearing on the motion on March 20, 2017 at 3:00 pm. The Plaintiff fears that she will experience the identical scenario experienced in October in 2016 and ask if the court sees fit to recognize this motion, the hearing should be set on another date due to the sensitivity and importance of the Plaintiff's motion. The Plaintiff is submitting this motion to dismiss the motion of the Plaintiff. The Defendants are asking for an order to dismiss the Complaint on the grounds that the Plaintiff cannot meet the necessary elements of this cause of action. The Plaintiff can meet the necessary elements of this cause of action. The factual documentation requested by the Plaintiff in the First and Second Interrogatories are highly important to the Plaintiff. The Plaintiff has gleaned the Affidavits provided by the Defendants and provided documentation that support the

objectionable testimony communicated by the Defendants and pray that the court will not find the testimony to be supportive based on the motion provided by the Defendants.

Respectfully submitted,

Aminah A. Richburg Pro Se



March 6, 2017

Aminah A. Richburg
217 Plum Creek Lane
Greenville, SC 29607
(864)-419-6707

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	Docket No. : 2016-CP-23-02113
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	
Plaintiff	)	CHALLENGE THE RELIABILITY AND VALIDITY
	)	OF AFFIDAVIT OF DEFENDANT E.A. "RICO"
v.	)	WILLIAMS BY THE PLAINTIFF
E.A. "RICO" WILLIAMS, DIRECTOR	)	
DISTRICT ONE SC BASKETBALL	)	
OFFICIALS ASSOCIATION AND THE	)	
SOUTH CAROLINA HIGH SCHOOL	)	
LEAGUE	)	
	)	
Defendants	)	

FILED-CLERK OF COURT
PAUL B. WICKENSIMER
GREENVILLE CO. SC
2017 MAR -6 AM 11:19

The Defendant E.A. Rico Williams appeared before the undersigned Notary Public, who upon being duly sworn did depose and say as follows and the Plaintiff in this documents will challenge the reliability and validity of each statement with facts and documents and communicate the lack of documentation due to the failure of Sarah Day Hurley and Michael Montgomery-undersigned-counsel-to-the-Defendants-to-produce-all-documents requested in discovery by the Plaintiff.

1. I am over the age of eighteen (18) years, have personal knowledge of the facts stated herein, and am competent to make this affidavit.

1. The Plaintiff accepts the information.

2. I reside in Greenville County and am currently employed with Federal Express as a Materials Handler.

2. The Plaintiff sent the FIRST SET OF REQUEST FOR PRODUCTION TO DEFENDANT , on June 20, 2016 and requested all tax returns, both federal and State for the five years. The Defendant does not find the information credible. The Defendant has failed to produce documentation for the FIRST SET OF REQUEST FOR PRODUCTION TO DEFENDANT.

3. For more than 20 years, I have been a basketball official for District One of the South Carolina Basketball Officials Association ("District One"). The South Carolina Basketball Officials Association ("SCBOA") is a separately-created organization that operates under the South Carolina High School League ("League"). The SCBOA is governed by its own Constitution and By-Laws, and the purpose of the SCBOA is for the training and development of basketball officials, as well as maintenance of a booking office for high schools, prep schools, and others desiring the services of basketball officials.

3. The Plaintiff gleaned SCHSL 024 – 2015-2016 BB Ratings, E.A. Rico Williams had 21 years of experience. The South Carolina High School League has a regulatory fiduciary and judiciary responsibility. (Code of Ethics SCHSL 002. (Application for membership SCHSL 001). The SCBOA function is informational in order to enhance communication procedures as much as it is to be a guideline for professional conduct for the officials of the District I South Carolina Basketball Officials Association. (Williams 00001)

4. Officials can become certified in more than one sport; I choose to officiate only basketball games.

4. The Plaintiff has been told by various officials that they do not care to work with E.A. Rico Williams that are in leadership positions for other sports, which is why the Defendant only officiates basketball.

5. In order to become and remain a certified SCBOA basketball official, each year I have attended mandatory training meetings, studied basketball rules and regulations, watched films, received training and feedback from other officials, and taken and passed annual tests for certification as a basketball official.

5. The Plaintiff also attended mandatory training meetings each year, studied basketball rules and regulations, watched films, received training and feedback from other officials, and taken and passed annual test for certification as a basketball officials. The Defendants response is mandatory for all basketball officials. When officials meet the requirements communicated by the Defendant E.A. Rico Williams, they receive a schedule for the basketball season which the Plaintiff received for the 2015-2016 Basketball season. The Plaintiff met all requirements communicated by the Code of Ethics for the 2015-2016 Basketball season and did nothing to warrant termination initiated and deviously masterminded by E.A. Rico Williams with the assistance of the South

Carolina High School League who failed to investigate and manage the incident communicated by the Plaintiff because of the District One Directors direct involvement in the matter.

6. Every District One basketball official must sign a "SCBOA District 1 Contract." The contract provides a guideline for professional conduct. It also clearly states that an official may be dismissed by the SCBOA for failure to abide by professional standards set forth by the SCBOA.

6. The SCBOA function is informational in order to enhance communication procedures as much as it is to be a guideline for professional conduct for the officials of the District I South Carolina Basketball Officials Association. (Williams 00001). The Plaintiff attended mandatory training meetings each year, studied basketball rules and regulations, watched films, received training and feedback from other officials, and taken and passed annual test for certification as a basketball officials. The Plaintiff met all of the requirements and received a schedule for the 2015-2016 Basketball season. The Plaintiff met all requirements communicated by the Code of Ethics for the 2015-2016 Basketball season and did nothing to warrant termination initiated and diabolically masterminded by E.A. Rico Williams with the assistance of the South Carolina High School League who failed to investigate and manage the complaint communicated by the Plaintiff. The "SCBOA District I Contract is a guide, unfortunately the guide does not communicate procedural expectations based on hearsay between a District Director and an official towards another official. The Plaintiff abided by all professional standards and communicated that to the Defendant and attempted to seek assistance from the South Carolina High School League representative based on the incident involvement of the District Director (Defendant) E.A. Rico Williams and an official (Plaintiff).

7. The SCBOA District 1 Contract signed by all officials states in relevant part that "the District 1 Director has the authority to enforce professional standards and to accept or reject [an official's] transfer to another district or readmittance to the SCBOA."

7. The Defendant on February 4, 2016 (Williams 00004), (Williams 00005) did not communicate to Plaintiff that she violated professional standards and henceforth will reject continued membership with SCBOA District One. The Defendant did not communicate that the Plaintiff would be removed from the assignment at Furman University and the games assigned on February 6, 2016. On February 5, 2016, the Defendant in a cowardly devious manner copied an email to SCBOA District Board Members and Skip Lax and sent the email to the Plaintiff addressing concerns the Plaintiff communicated to the Defendant. The Defendant on February the 5, 2016, manipulated information and created a false narrative that the Plaintiff was marked off by two schools and by ten officials and elaborating that recent conversations during the 2015-2016 basketball season, the officials communicated that the Plaintiff is unwilling to accept constructive criticism, advice, instruction or any information given by them that the Plaintiff deems is necessary. The Defendant created arrival times for the Plaintiff and meeting attendance. On June 20, 2016, the Plaintiff First Set of Continuing Interrogatories to Defendant, the Plaintiff asked for a copy of all sign in sheets or attendance sheets with arrival times for all members attending Meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years. Response: Turner Padget, 200 East Broad Street, Suite 250, 29601 – Defendant will

conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection. The Defendants have not provided the information. The Defendants decisions and actions were not initiated by any marginal or unprofessional actions by the Plaintiff according to the SCBOA District I Contract referred by the Defendant. The behavior and actions of the Defendant were personal and retaliatory based on concerns communicated by the Plaintiff. The Defendant stated (Williams 00005) "Without repeating again word for word your comments concerning "professionalism", declining standards", etc. it is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route you deem favorable.

8. District One basketball officials are independent contractors, not employees. Officials are paid a one-time fee for officiating services at the end of every game.

8. (Williams 00002) Code of Ethics As an approved South Carolina High School League official, it is hereby agreed, stipulated and understood that my employment as a High School League Official is that of an independent contractor and not as an employee of the South Carolina Basketball Officials Association, South Carolina High School League or the school districts or high schools competing in an interscholastic athletic competition event. The Plaintiff was an approved South Carolina High School League Official and was given a schedule for the 2015-2016 Basketball season. The Defendants actions initiated by E.A. Rico Williams caused damages and injuries to the Plaintiff. The Defendants acted with the course and scope of the organization with the knowledge, consent and approval and their conduct was ratified. In particular, at all times material hereto, defendants, individually and through their officers, directors, members, authorized the wrongful conduct and/or were personally guilty of defamation, malice, negligence and/or recklessness. The actions of the Defendants prevented the Plaintiff's ability to serve as an independent contractor which caused the Plaintiff to sustain substantial injury to her professional reputation and good will, lost earnings and loss of consortium.

9. Every basketball official is subject to a Code of Ethics (Williams 00002). Aminah Richburg, as a District One basketball official, was bound by the Code of Ethics.

9. (Williams 00002) Code of Ethics- As an approved South Carolina High School League official, it is hereby agreed, stipulated and understood that my employment as a High School League Official is that of an independent contractor and not as an employee of the South Carolina Basketball Officials Association, South Carolina High School League or the school districts or high schools competing in an interscholastic athletic competition event. The Plaintiff was an approved official for the 2015-2016 Basketball season and received a schedule. The Plaintiff did not violate any of the Code of Ethics and was diabolically terminated due to the unethical behavior of the Defendants.

10. On July 1, 2015, I became the Director for the District One Basketball Association. Prior to that, I held the position of Associate Director for 12 years. Prior to becoming an Associate Director, I had served on the District One Board for five years as a non-officer Board member.

10. The Plaintiff alleges that there is no position of an Associate Director and there is no non-officer Board member position as well. The positions communicated by the Defendant are created by the Defendant, the Constitution states in Article IV Officers and Directors, A. The officers of the Association shall be, one director, one president, one vice president and one secretary.

11. As the Director, I have many responsibilities, including scheduling and leading all basketball officials' meetings, monitoring attendance at such meetings, supervising game and scrimmage schedules and assignment of officials, and attending quarterly Directors' meetings. A full list of my responsibilities is included in the "SCBOA Director Responsibilities", which is contained on the League's website.

11. The Plaintiff on October 21, 2016, in the SECOND SET OF CONTINUING INTERROGATORIES TO DEFENDANT, requested all training and contract documentation for District I Director, E.A. "Rico" Williams especially with regard to proper communication, confidentiality, grounds to terminate officials, sexual harassment, leadership and solicitation from 2013-2016. The Plaintiff has not received any information from the Defendant for the SECOND SET OF CONTINUING INTERROGATORIES TO DEFENDANT.

12. Skip Lax is an Assistant Commissioner of the South Carolina High School League, who serves as the Commissioner of Officials. The role of the Commissioner of Officials is set forth in the By-Laws of the SCBOA.

12. Article X Discipline of Officials- Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors. Discipline of Officials – Official associations may set up rules and regulations for the discipline of its members. The legislative assembly of the South Carolina High School League is of the opinion that the final authority of discipline for both schoolmen and athletic game officials must be centralized and that this centralized authority will be the Executive Director of the League. The Defendant E.A. "Rico" Williams has personal relationships with many South Carolina High School League officials and he abused his power to influence the course and scope of the organization with the knowledge, consent and approval and their conduct was ratified. In particular, the defendants, individually and through their officers, directors, members, authorized the wrongful conduct of E.A. "Rico" Williams, and/or were personally guilty of defamation, malice, negligence and/or recklessness toward the Plaintiff.

13. In addition to serving as the Director for the District One Basketball Association, I also assist in scheduling non-League basketball games for local club tournaments, college intramural, and city recreational games. One of the reasons I do this is to help individuals who are interested in basketball officiating opportunities learn, gain experience, develop their skills, and earn additional money.

13. The Plaintiff on June 20, 2016 in the FIRST SET OF CONTINUING INTERROGATORIES TO DEFENDANT, the Plaintiff requested a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years and provide a list of all officials assigned to work with the Plaintiff for all games he assigned the Plaintiff for the past three (3) years. The Defendant has not provided the information. Plaintiff's SECOND SET OF CONTINUING INTERROGATORIES TO DEFENDANT, Please provide a listing of first and last names of SCBOA District I officials that have officiated games for E.A. Rico Williams from 2013-2016, Please provide a listing of first and last names of Board members of the SCBOA District I that officiated games for E.A. Rico Williams 2013-2016, Please provide the E.A. "Rico" Williams business game schedules for SCBOA District One Board Members that officiated games through E.A. "Rico" Williams business from 2013-2016. The Defendant has not provided the information. The information provided the Defendant in objectionable and the Plaintiff alleges that the information is untrue. The Defendant does not schedule games for any organization. The Defendant through his business provides officials for the games scheduled by organizations. The purpose of the Defendants business is only proprietary for the Defendant, not to help individuals but to help the Defendant and allow individuals to earn money for their officiating services through the Defendants business.

14. In 2014, Aminah Richburg expressed an interest in officiating non-League games as well as SCBOA games, so when possible, I would facilitate some of those assignments to her. Those assignments included city recreational games at the YMCA and intramural games at Furman University. Ms. Richburg earned additional fees, outside of any fees earned by officiating League games, through these assignments.

14. The Plaintiff has provided documents that support the solicitation from E.A. Rico Williams to officiate non-league games through his business. The Defendant has failed to send documentation requested in the First and Second Interrogatories pertaining to all matters concerning the assignments the Defendant communicated to the Plaintiff. The Defendant has also failed to send documentation of non-league the officials assigned to work for the defendant for non-league games, listing of other officials given assignments by the Plaintiff, SCBOA District I Board Members assigned games through the Defendant with the Plaintiff.

15. At the beginning of my term as Director in July 2015, I implemented a few new requirements for our District members, one being that I asked volleyball officials who were also basketball officials to participate more in the basketball meetings. Because some officials may officiate more than one sport, sometimes conflicts arise because meetings for one sport may overlap with meetings for another sport.

15. The Defendant did not implement any new requirements, E.A. Rico Williams only communicated that officials were required to attend four (4) meetings. The Plaintiff attended four meetings. (Williams 00002) Code of Ethics- As an approved South Carolina High School League official, it is hereby agreed, stipulated and understood that my employment as a High School League Official is that of an independent contractor and not as an employee of the South Carolina Basketball Officials Association, South Carolina High School League or the school districts or high schools competing in an interscholastic athletic competition event. The Plaintiff was an approved official for the 2015-2016 Basketball season and received a schedule. The Plaintiff did not violate any of the Code of Ethics and was diabolically terminated due to the unethical behavior of the Defendants. There are officials that officiate football as well as basketball. Volleyball and Football games are conducted at the same time during the fall. The Plaintiff officiates football and volleyball.

16. The meetings are important because they serve as a training ground for officials. Among other things, basketball rules and regulations are reviewed and discussed at every meeting.

16. The Plaintiff has attended many meetings since she became an official and a majority of the meeting is set aside to review and discuss rules which are read from the rule book or displayed in a Power point.

17. Before I became the Director, the previous District One Director allowed volleyball officials to miss all basketball meetings, except three which are mandated by the League.

17. The Defendant has communicated an untruth about the previous director and that individual in unaware of the false communication provided by the Defendant in this Affidavit. Mr. E.A. Rico Williams required officials to attend four meetings.

18. Several District One basketball officials, including Aminah Richburg, officiated both basketball and volleyball games.

18. The Plaintiff for the 2015-2016 season, officiated football, volleyball, basketball, lacrosse and softball. Many District One Basketball officials officiate football and volleyball before basketball season.

19. After consulting with other Directors on how they have handled attendance and meeting requirements for officials who work more than one sport, I decided to implement a new rule which required basketball officials to attend at least four (4) of the regularly scheduled meetings, which began at 6:00 p.m. and ended at 8:00 p.m. I communicated this new rule to all District One basketball officials at the beginning of the 2015-2016 season.

19. The Plaintiff attended four meetings communicated by the Defendant, the Defendant never specified what meetings. (Williams 00002) Code of Ethics- As an approved South Carolina High School League official, it is hereby agreed, stipulated and understood that my employment as a High School League Official is that of an independent contractor and not as an employee of the South Carolina Basketball Officials Association, South Carolina High School League or the school districts or high schools competing in an interscholastic athletic competition event. The Plaintiff was an approved official for the 2015-2016 Basketball season and received a schedule. The Plaintiff did not violate any of the Code of Ethics and was diabolically terminated due to the unethical behavior of the Defendants. (Williams 00033) The Plaintiff attended four meetings and was approved by her attendance by receiving a game schedule for the 2015-2016 Basketball Season.

20. Aminah Richburg frequently came late to the basketball meetings during the 2015-2016 season. At the first meeting, Ms. Richburg was present from beginning to end. At the meeting on September 21, she arrived at 7:35 p.m. At the October 19 meeting, she arrived at 7:05 p.m. At the meeting on November 2, she arrived at 6:50 p.m. I believe these times are accurate based on records kept by Kevin Brown, the Secretary/Treasurer for District One.

20. On June 20, 2016, the Plaintiff First Set of Continuing Interrogatories to Defendant, the Plaintiff asked for a copy of all sign in sheets or attendance sheets with arrival times for all members attending Meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years. Response: Turner Padget, 200 East Broad Street, Suite 250, 29601 – Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection. The Defendants have not provided the information. The Defendant in his Affidavit has communicated untruths for arrival times

for the Plaintiff and his beliefs are unwarranted. The Defendant has failed to produce meeting sign in sheets with arrival times for all members of District One from 2013-2016.

21. Aminah Richburg also failed to attend the required "Mechanics" meeting and required "Mid-Season" meeting. This meant that she missed roughly eight (8) out of eleven (11) meetings that were held for District One basketball officials.

21. The Plaintiff attended four meetings communicated by the Defendant, the Defendant never specified what meetings. (Williams 00002) Code of Ethics- As an approved South Carolina High School League official, it is hereby agreed, stipulated and understood that my employment as a High School League Official is that of an independent contractor and not as an employee of the South Carolina Basketball Officials Association, South Carolina High School League or the school districts or high schools competing in an interscholastic athletic competition event. The Plaintiff was an approved official for the 2015-2016 Basketball season and received a schedule. The Plaintiff did not violate any of the Code of Ethics and was diabolically terminated due to the unethical behavior of the Defendants. (Williams 00033) The Plaintiff attended four meetings and was approved by her attendance by receiving a game schedule for the 2015-2016 Basketball Season.

22. On or about February 2, 2016, Aminah Richburg was assigned to officiate a game at Beck Middle School. Later that day, I was informed by the other official who worked that game, John Williams, that Ms. Richburg had officiated wearing tight "jogging/workout" pants, which are not approved attire for District One officials.

22. There is no way to determine the validity and reliability of the statement communicated by E.A. "Rico" Williams on or about February 2, 2016 /later that day. E.A. Rico Williams continuous fiction narratives based on hearsay is objectionable. The alleged truth communicated by E.A. "Rico" Williams that the alleged defamatory statements made by Defendant Williams were true based on his testimony and lack of documentation produced in the case, does not entitle Mr. E.A. Williams nor the South Carolina High School League to qualified privilege.

The motion presented along with the Affidavit of E.A. "Rico" Williams, Deposition Testimony of the Plaintiff by which the Plaintiff Requested Corrections, are not applicable to common and statutory law of South Carolina along with supporting Memorandum of Law.

The Plaintiff wore an official uniform for all games from 2013 -2016. Article XI Uniforms – South Carolina Basketball Officials Association

a. Each official shall have a complete standard uniform, which shall be as follows:
   1. Black and white vertically striped v-neck short sleeve knit shirt. Straight leg black trousers without cuffs. (Trousers may be pleated or plain.)
   2. Black official shoes (if low cut shoes are worn, officials must wear black socks). A black shoe with a white trim may be worn if all officials wear them.
   3. Black jacket made of wool or nylon, without a hood, and with or without a waistband.

b. The SCBOA or any district may, as a memorial, place a patch or band on their left shirt sleeve for a period of one year, for each memorial situation.

23. The previous year, during a JV tournament, I had to speak to Ms. Richburg about the fact that she was wearing inappropriate clothing to officiate a game, and reminded her that she needed to wear the official's pants when representing District One. So, this was not the first time I had learned that Ms. Richburg failed to comply with District One uniform requirements.

23. The Defendant was not required to speak to the Plaintiff at all. (Jenny Norris), the District One Director for the 2014-2015 Basketball season approached the Plaintiff to congratulate her on her performance during the JV tournament. The Plaintiff wore an official uniform for all games from 2013 -2016. Article XI Uniforms – South Carolina Basketball Officials Association

a. Each official shall have a complete standard uniform, which shall be as follows:

1. Black and white vertically striped v-neck short sleeve knit shirt. Straight leg black trousers without cuffs. (Trousers may be pleated or plain.)

2. Black official shoes (if low cut shoes are worn, officials must wear black socks). A black shoe with a white trim may be worn if all officials wear them.

3. Black jacket made of wool or nylon, without a hood, and with or without a waistband.

b. The SCBOA or any district may, as a memorial, place a patch or band on their left shirt sleeve for a period of one year, for each memorial situation.

The Defendant continues to communicate falsehoods – So, this was not the first time I had learned that Ms. Richburg failed to comply with District One uniform requirements is subject to objection with this affidavit.

24. Following receipt of this information on February 2, 2016, I called and left a voicemail message for Ms. Richburg and asked her to call me. I also sent her a text message asking her to call me. The purpose of my call was twofold: I wanted to confirm her availability to officiate a non-League game at Furman University, and I wanted to ask her if it was true what had been reported about what she was wearing at the Beck Middle School game.

24. The Defendant has communicated another falsehood, there was not report submitted about what the Plaintiff wore at a Beck Middle School game. The statement is subject to objection with this affidavit. There is no way to determine the validity and reliability of the statement communicated by E.A. "Rico" Williams on February 2, 2016. E.A. Rico Williams continuous fiction narratives based on hearsay is objectionable. The alleged truth communicated by E.A. "Rico" Williams that the alleged defamatory statements made by Defendant Williams

were true based on his testimony and lack of documentation produced in the case, does not entitle Mr. E.A. Williams nor the South Carolina High School League to qualified privilege.

The motion presented along with the Affidavit of E.A. "Rico" Williams, Deposition Testimony of the Plaintiff by which the Plaintiff Requested Corrections, are not applicable to common and statutory law of South Carolina along with supporting Memorandum of Law.

25. When she called me back, I informed her that someone reported that she was wearing tight jogging pants to officiate the game at Beck Middle School on February 2. When I asked her if the report was true, she curtly replied "I don't wear jogging pants. Is that all?" I then asked her if it was problematic for her with me asking that question. She then stated "I don't wear jogging pants. I'm at work. Is that all?" I did not dispute her response and stated that we would talk again soon. Although Ms. Richburg's response to me was short, terse and rude, I decided to let it go.

25. The Defendant has communicated another falsehood and the statement "stated that we would talk again soon ", is subject to objection with this affidavit. The statement, " I decided to let it go" clearly supports the Plaintiff,

The Plaintiff wore an official uniform for all games from 2013 -2016. Article XI Uniforms – South Carolina Basketball Officials Association

a. Each official shall have a complete standard uniform, which shall be as follows:

1. Black and white vertically striped v-neck short sleeve knit shirt. Straight leg black trousers without cuffs. (Trousers may be pleated or plain.)

2. Black official shoes (if low cut shoes are worn, officials must wear black socks). A black shoe with a white trim may be worn if all officials wear them.

3. Black jacket made of wool or nylon, without a hood, and with or without a waistband.

b. The SCBOA or any district may, as a memorial, place a patch or band on their left shirt sleeve for a period of one year, for each memorial situation.

26. A few minutes later, Ms. Richburg sent me a lengthy text which stated the following:

"Please discontinue the harassing communications. Previous District One leaders presented a higher level of professionalism which made officiating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL."

26. The Plaintiff has a right as a human being to communicate as an adult to an adult her dismay with a prior communications from E.A. Rico Williams. The Plaintiff did not communicate that she did not want to be a member of District One, or seek opportunities to officiate in another district. The Plaintiff communicated her disdain with E.A. Rico Williams. There is no mention of the Plaintiff's disdain with other members of District I that serve in leadership positions nor individuals at the South Carolina High School League.

27. On February 5, 2016, I sent a follow up email to Ms. Richburg summarizing our previous communications, acknowledging her displeasure with current leadership, and offering to assist her with transfer to another District if that was her preference. (Williams 00004-00005).

27. The Defendant on February 4, 2016 (Williams 00004), (Williams 00005) did not communicate to Plaintiff that she violated professional standards and henceforth will reject continued membership with SCBOA District One. The Defendant did not communicate that the Plaintiff would be removed from the assignment at Furman University and the games assigned on February 6, 2016. On February 5, 2016, the Defendant in a cowardly devious manner copied an email to SCBOA District Board Members and Skip Lax and sent the email to the Plaintiff addressing concerns the Plaintiff communicated to the Defendant. The Defendant on February the 5, 2016, manipulated information and created a false narrative that the Plaintiff was marked off by two schools and by ten officials and elaborated recent conversations during the 2015-2016 basketball season, officials communicated that the Plaintiff is unwilling to accept constructive criticism, advice, instruction or any information given by them that the Plaintiff deems is necessary. The Defendant created arrival times for the Plaintiff and meeting attendance. On June 20, 2016, the Plaintiff First Set of Continuing Interrogatories to Defendant, the Plaintiff asked for a copy of all sign in sheets or attendance sheets with arrival times for all members attending Meetings for the District One South Carolina Basketball Officials Association and the South Carolina High School League for the past five (5) years. Response: Turner Padget, 200 East Broad Street, Suite 250, 29601 – Defendant will conduct a

reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection. The Defendants have not provided the information. The Defendants decisions and actions were not initiated by any marginal or unprofessional actions by the Plaintiff according to the SCBOA District I Contract referred by the Defendant. The behavior and actions of the Defendant were personal and retaliatory based on concerns communicated by the Plaintiff. The Defendant stated (Williams 00005) "Without repeating again word for word your comments concerning "professionalism", declining standards", etc. it is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route you deem favorable. The Plaintiff did not communicate a need to transfer to another district. The Plaintiff communicated her disdain with the prior communication she received from the Defendant.

28. On the email, I copied Skip Lax, who is the Commissioner of Officials, and the members of the District One Board of Directors, so they would be aware of the communication that had been sent. Also, because she had accused me of "harassing" her and stated that she was going to "communicate" to the League regarding my "monopoly status" and how I had "manipulated the District One organization," I felt it was necessary to provide the Board and Mr. Lax with a complete summary of our previous communications.

28. The Plaintiff did not initiate any communications and all summaries/narratives were initiated, created and distributed by E.A. Williams. The Defendant in a cowardly devious manner copied an email to all SCBOA District Board Members and Skip Lax and sent the email to the Plaintiff addressing concerns the Plaintiff communicated to the Defendant to distort the character and professionalism of the Plaintiff, fabricate a scenario that the Plaintiff is difficult to work with when assigned with fellow officials for the 2015-2016 basketball season to further blight the Plaintiff. The Defendants actions initiated by E.A. Rico Williams caused damages and injuries to the Plaintiff. The Defendants acted with the course and scope of the organization with the knowledge, consent and approval and their conduct was ratified. In particular, at all times material hereto, defendants, individually and through their officers, directors, members, authorized the wrongful conduct and/or were personally guilty of defamation, malice, negligence and/or recklessness. The actions of the Defendants prevented the Plaintiff's ability to serve as an independent contractor which caused the Plaintiff to sustain substantial injury to her professional reputation and good will, lost earnings and loss of consortium.

29. In my email to Ms. Richburg, I also mentioned to her that she had been "marked off" by ten (10) officials and two schools. This was true. (A list of the officials who had blocked Aminah Richburg, and the dates such blocks were entered, has been provided to Ms. Richburg in connection with this lawsuit and is marked "Confidential – Williams 00038").

29. On January 18, 2017, the Plaintiff communicated that she had not received the listing of the ten officials from E.A. Rico Williams. The South Carolina High School League sent the names of schools and the names of officials and communicated that these names would not necessarily be the ones referenced in Mr. William's email of February 5, 2016, as these names have only been entered in the Arbiter System used to schedule varsity contest. The Plaintiff has never officiated a varsity basketball game from 2013-2016. Seven of the names provided by the Defendant (South Carolina High School League) are not members of the South Carolina Basketball Officials Association and are not represented in any basketball district in the state of South Carolina. (00022-00032 Williams), (SCHSL 045-075).

The Defendants Answers To Plaintiff's First Set of Continuing Interrogatories – 17. Provide documentation of all ten officials communicated by E.A. Rico Williams that blocked the Plaintiff in the South Carolina High School league / SCBOA District One.

Response: Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

The Defendant E.A. Rico Williams sent his list after the Plaintiff filed Memorandum In Support of Motion to Dismiss Protective Order, Reversal of Court Protection Order. The ten names provided by the Defendant, the Plaintiff has gleaned the confidential information and pleads with the Court to support her objection to the false information provided and would ask the court to question the validity and reliability of the alleged true information communicated by E.A. Williams in the affidavit. According to the information provided by E.A. Rico Williams. The officials presented by the Defendant E.A. Williams are objectionable and the Plaintiff alleges that they were recently created by the Defendant along with blocked dates with the Plaintiff.

SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL- SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
OFFICIAL 1	NONE		
OFFICIAL 2	NONE		
OFFICIAL 3	(2) 12/11/14 , 1/30/15		11/20/15
OFFICIAL 4	NONE		
OFFICIAL 5	NONE		
OFFICIAL 6	NONE		
OFFICIAL 7	2/2/15		4/4/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (WILLIAMS 00038)	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) –DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES/ EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE) PRESENTED BY DEFENDANT – E.A. RICO WILLIAMS
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 Game Scheduled no Block

30. I also informed Ms. Richburg that many of the officials who had blocked her from their games had concerns about her "unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary." This was true. Prior to this incident, and since I became the District One Director, a number of officials who had worked with Ms. Richburg had expressed to me their desire not to officiate games with Ms. Richburg anymore based on her unwillingness to accept constructive criticism and advice. Despite the negative comments that I had received, I attempted to help Ms. Richburg improve her skills by continuing to offer opportunities for her to officiate non-League basketball games, in order to improve her skills and gain experience.

30. The Defendant E.A. Rico Williams sent his list after the Plaintiff filed Memorandum In Support of Motion to Dismiss Protective Order, Reversal of Court Protection Order. The ten names provided by the Defendant, has been gleaned by the Plaintiff. (Williams 00022-00032) The confidential information is not substantiated and the Plaintiff pleads with the Court to support her objection to the false information provided and would ask the court to question the validity and reliability of the alleged true information communicated by E.A. Williams in the affidavit. According to the information provided by E.A. Rico Williams that ten officials had blocked her during the 2015-2016 basketball season and communicated concerns about the Plaintiff's unwillingness to accept constructive criticism, advice, instruction or nay information given by them that the Plaintiff may deem unnecessary is untrue. The Defendant E.A. Rico Williams has a business that provides officials for games for various groups and organizations. The Plaintiff's assignments for games promoted Mr. Williams business and the Plaintiff objects to the false narrative that the games were assigned to help the Plaintiff improve her skills and gain experience.

    On January 18, 2017, the Plaintiff communicated that she had not received the listing of the ten officials from E.A. Rico Williams. The South Carolina High School League sent the names of schools and the names of officials and communicated that these names would not necessarily be the ones referenced in Mr. William's email of February 5, 2016, as these names have only been entered in the Arbiter System used to schedule varsity contest.

The Plaintiff has never officiated a varsity basketball game from 2013-2016. Seven of the names provided by the Defendant (South Carolina High School League) are not members of the South Carolina Basketball Officials Association and are not represented in any basketball district in the state of South Carolina. (00022-00032 Williams), (SCHSL 045-075).

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OFFICIAL 4	NONE		
OFFICIAL 5	NONE		
OFFICIAL 6	NONE		
OFFICIAL 7	2/2/15		4/4/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (Williams 00038) Protective Order	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) – DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES WITH EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS – NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE)
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) - 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) - 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) - 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 – Game Scheduled no Block

31. As the District One Director, I have the authority to reject an official's renewal application. However, in fairness to Ms. Richburg, and because her complaint seemed to be aimed at me personally, I decided it would be best to recuse myself from making any decision to discipline her. Therefore, I decided to have the Board review and vote on the matter of whether to discipline, suspend, and/or terminate Ms. Richburg's District One membership based on the issues addressed in my email. In my experience as an Associate Director, the District One Board would become involved in decisions to discipline officials, including termination decisions.

31. The Plaintiff objects to the statement of fairness in the affidavit which is an untruth. Mr. Williams conspired with Mr. Joedy Moots the SCBOA Officials Representative with extreme malice towards the Plaintiff by reading confidential information between the Plaintiff and Mr. Joedy Moots he obtained from Mr. Joedy Moots(Williams 00017). Mr. Williams shared this information to influence the Board members before they voted along with other falsified information. The Defendant E.A. Rico Williams communicated, Aminah Richburg-wrote SCBOA Officials Representative, SCBOA Officials Representative response read. The reliability and validity of the vote is questionable, it has clearly been altered and there is no distinction on the results of the vote and the members present. Mr. Williams communicated later that one board member was in attendance and it is not reflected in the attendance or the vote. Many members of the Board Are in collusion with the Defendant and officiate games for the Defendant and assign officials for games much like

Mr. Williams. Again Mr. Williams created a false narrative in the email and used it in a diabolical way to terminate the membership of the Plaintiff.

32. Therefore, on February 25, 2016, I sent an email to Ms. Richburg to inform her that the District One Board of Directors would be reviewing her status as a future SCBOA District One member at its next Board meeting. I invited Ms. Richburg to attend the Board meeting so that she could communicate directly with the Board members and present any information on her behalf. (Williams 00010).

32. (Williams 00005) The email sent by the Defendant on February 5, 2016, Mr. Williams communicated, "you will not be considered for any future assignments until your status as a District I member is reviewed by the Board of Directors. The Plaintiff objects to the misleading statement communicated in the affidavit by the Defendant. The Defendant did not extend an invitation to a meeting, he only stated that the Plaintiff's status would be reviewed by the Board of Directors. The Plaintiff received many email messages from the SCBOA since her initial reading of the email, because her status was being reviewed there was no need for the Plaintiff to read or glean the messages to see if a status invitation was granted. The Plaintiff officiates Softball and Lacrosse and her basketball season was finished according to the Defendant.

33. Ms. Richburg never responded to my February 25 email.

33. (Williams 00005) The email sent by the Defendant on February 5, 2016, Mr. Williams communicated, "you will not be considered for any future assignments until your status as a District I member is reviewed by the Board of Directors. The Plaintiff objects to the misleading statement communicated in the affidavit by the Defendant. The Defendant did not extend an invitation to a meeting, he only stated that the Plaintiff's status would be reviewed by the Board of Directors. The Plaintiff received many email messages from the SCBOA since her initial reading of the email, because her status was being reviewed there was no need for the Plaintiff to read or glean the messages to see if a status invitation was granted. The Plaintiff officiates Softball and Lacrosse and her basketball season was finished according to the Defendant.

34. Ms. Richburg also did not attend the Board meeting to which she was invited.

34. (Williams 00005) The email sent by the Defendant on February 5, 2016, Mr. Williams communicated, "you will not be considered for any future assignments until your status as a District I member is reviewed by the Board of Directors. The Plaintiff objects to the misleading statement communicated in the affidavit by the Defendant. The Defendant did not extend an invitation to a meeting, he only stated that the Plaintiff's status would be reviewed by the Board of Directors. The Plaintiff received many email messages from the SCBOA since her initial reading of the email, because her status was being reviewed there was no need for the Plaintiff to read or glean the messages to see if a status invitation was granted. The Plaintiff officiates Softball and Lacrosse and her basketball season was finished according to the Defendant.

35. At the Board meeting on February 29, 2016, the members of the Board voted not to accept Ms. Richburg's application for membership in District One during the 2016-2017 school year. I did not vote at the Board meeting. My vote would only have been required in the event of a tie. The majority of the Board members voted not to accept any renewal application that Ms. Richburg might submit.

35. Mr. Williams conspired with Mr. Joedy Moots the SCBOA Officials Representative with extreme malice towards the Plaintiff by reading confidential information between the Plaintiff and Mr. Joedy Moots he obtained from Mr. Joedy Moots (Williams 00017). Mr. Williams shared this information to influence the Board members before they voted along with other falsified information. The Defendant E.A. Rico Williams communicated, Aminah Richburg-wrote SCBOA Officials Representative, SCBOA Officials Representative response read. The reliability and validity of the vote is questionable, it has clearly been altered and there is no distinction on the results of the vote and the members present. Mr. Williams communicated later that one board member was in attendance and it is not reflected in the attendance or the vote. Many members of the Board Are in collusion with the Defendant and officiate games for the Defendant and assign officials for games much like Mr. Williams. Again Mr. Williams created a false narrative in the email and used it in a diabolical way to terminate the membership of the Plaintiff.

36. On March 14, 2016, I notified Skip Lax, Jerome Singleton, and Joedy Moots of the District One Board's decision to reject Ms. Richburg's application for renewal in 2016-2017. I also asked them to approve a draft email I was going to send to Ms. Richburg to advise her of the Board's decision. Due to the positions that Jerome Singleton holds (and held at the time) as Executive Director of the League, that Skip Lax holds (and held at the time) as Commissioner of Officials, and that Joedy Moots held (at the time) as the Officials' Representative, and due to the seriousness of the situation, I believed it was appropriate to inform them of the Board's decision, and to seek their advice prior to notifying Ms. Richburg of the same. I also anticipated that Ms. Richburg would appeal the Board's decision, so I sought the League's guidance

to ensure that I was handling my communications with Ms. Richburg in an appropriate manner.

36. The Plaintiff objects to the communication in this affidavit, the Defendant did not handle any communications with the Plaintiff in an appropriate manner and all of the representative members of the South Carolina High School League communicated by E.A. Rico Williams were in collusion with the Defendant from the beginning and dismissed the Plaintiff appeals for assistance with matters concerning her and the District Director. E.A. Rico Williams's diabolical emails and communications influenced all involved. Mr. Joedy Moots failed to represent the Plaintiff as her representative and serve as her advocate in the matter. Skip Lax refused to address the matter at all. The Plaintiff had no support whatsoever and the Plaintiff objects and rejects the false statement written after the fact by Mr. Williams that he anticipated that Ms. Richburg would appeal the Board's decision. The Defendant was given permission to follow through with the termination without any intervention from South Carolina High School league leaders who are responsible for intervening in fairness, equity and equality on behalf of the Plaintiff.

37. On March 21, 2016, I sent the email to Ms. Richburg informing her that the Board had voted that, if she had any intent to apply for future membership in District One, her application would not be accepted. On this email, I copied the members of the District One Board of Directors, and Skip Lax, Jerome Singleton, and Joedy Moots as representatives of the League, in order to keep them apprised of my communications with Ms. Richburg. (Williams 00013).

37. The Plaintiff became knowledgeable of her termination by receiving a letter from Mr. E.A. Rico Williams by registered mail. The Plaintiff did not see or read the email communication.

38. To the best of my knowledge, Ms. Richburg did not seek a review of the District One Board's decision to reject her application for renewal in 2016-2017.

38. The Plaintiff objects to the communication in this affidavit. (Williams 00013) the Defendant communicated, Aminah,
The SC Basketball Officials Association District One Board of Directors met on February 29th to discuss several issues including your present position within our District. In a February 25th email I invited you to meet with our Board of Directors to discuss any grievances or concerns that you may have. You were not in attendance. In light of your recent communications to me—the District One Director and Mr. Joedy Moots, the Officials Association's Representative on the South Carolina High School league's Executive Committee, your discontent and dissatisfaction with the present and future leadership and direction of District One is very apparent. In

addition, your denunciation of Mr. Moot's response to your contact further illustrates your displeasure with local and State leadership.

After a vote by the District One Board of directors, it has been determined that if there is any intent of yours to apply for future membership in District One, your application WILL NOT be accepted. If you have any desires to transfer to another SCBOA District, I will facilitate any communications that are needed. Please note that copies of this email will be sent to the following persons: Mr. Jerome Singleton-Commissioner of the SC High School league, Mr. Skip Lax – Assistant Commissioner of the SC High School League, Mr. Joedy Moots, and the District One Board of directors.

The Defendant did not communicate to the Plaintiff that she was entitled to seek a review of the District One Board's decision to reject her application for renewal in 2016-2017. The representative members of the South Carolina High School League communicated by E.A. Rico Williams were in collusion with the Defendant from the beginning and dismissed the Plaintiff appeals for assistance with matters concerning her and the District Director. E.A. Rico Williams's diabolical emails and communications influenced all involved. Mr. Joedy Moots failed to represent the Plaintiff as her representative and serve as her advocate in the matter. Mr. Joedy Moots shared all confidential information that could be used to blight the Plaintiff with E.A. Rico Williams and Mr. Williams communicated that in his termination letter and the communications were read aloud to influence Board Members to terminate the Plaintiff's membership. Skip Lax refused to address the matter at all. The Plaintiff had no organizational support from anyone affiliated with the South Carolina High School League or the South Carolina Basketball Association. The Defendant was given permission to follow through with the termination without any intervention from South Carolina High School league leaders who are responsible for intervening in fairness, equity and equality on behalf of the Plaintiff. The restraint from the leadership at the South Carolina High School League enabled E.A. Rico Williams to behave and communicate inappropriately and unprofessionally and these acts led to the defamation of the Plaintiff with Board members that were influenced by or were in collusion with E.A. Rico Williams in all matters he saw fit. The Plaintiff did not seek a review of the District One Board's decision to reject her application for renewal in 2016-2017 due to the lack of communication from the Defendant E.A. Rico Williams that she was entitled to do so. The letter of termination only communicated the Plaintiff's ability to transfer to another district. The Plaintiff communicated to South Carolina High School League representatives that she would experience a personal hardship, if she were required to transfer to another district and elaborated to say it was more than she could handle along with attempting facilitate the membership with travelling responsibilities.

The Affidavit produced by the Defendant E.A. Rico Williams is highly objectionable unreliable and invalid and therefore does not support the Notice of Motion and Motion for Summary Judgement by Defendant E.A. Rico Williams. The Plaintiff submitted corrections needed for her deposition testimony. The deposition testimony does not support the Memorandum of Law communicated by the Defendant and his counsel.

Respectfully Submitted,

Aminah A. Richburg Pro Se

Aminah A. Richburg
217 Plum Creek Lane
Greenville, SC 29607
(864) 419-6707

March 6, 2017

STATE OF SOUTH CAROLINA)
)
COUNTY OF GREENVILLE)
AMINAH A. RICHBURG)
Plaintiff)
)
v.)
E.A. "RICO" WILLIAMS, DIRECTOR)
DISTRICT ONE SC BASKETBALL)
OFFICIALS ASSOCIATION AND THE)
SOUTH CAROLINA HIGH SCHOOL)
LEAGUE)
)
Defendants)

IN THE COURT OF COMMON PLEAS
Docket No. : 2016-CP-23-02113

CHALLENGE THE RELIABILITY AND VALIDITY OF AFFIDAVIT OF DEFENDANT SKIP LAX

FILED-CLERK OF COURT
PAUL K. WICKENSIMER
GREENVILLE CO. S.C.
2017 MAR -6 AM 11:19

The Defendant Skip Lax appeared before the undersigned Notary Public, who upon being duly sworn did depose and say as follows and the Plaintiff in this documents will challenge the reliability and validity of each statement with facts and documents and communicate the lack of documentation due to the failure of Sarah Day Hurley and Michael Montgomery undersigned counsel to the Defendants to produce all documents requested in discovery by the Plaintiff.

1. I am over the age of eighteen (18) years, have personal knowledge of the facts stated herein, and am competent to make this affidavit.

1. The Defendant is over the age of eighteen but the Defendant Skip Lax does not have personal knowledge of the facts stated herein and is therefore incompetent to make this affidavit. Complaint /Answer of Defendant South Carolina High School League 44. For A Thirteenth Defense, 44. The defendant, South Carolina High School league, has not had an opportunity to conduct a sufficient investigation or to engage in adequate discovery touching on the circumstances in the plaintiff's Complaint.

The motion is not supported by the affidavit of Skip Lax, Assistant Commissioner and Commissioner of officials of the South Carolina High School league.

2. I reside in Lexington County and am currently employed by the South Carolina High School League (SCHSL or League) as an Associate Commissioner.

2. The Plaintiff sent the FIRST SET OF REQUEST FOR PRODUCTION TO DEFENDANT , on June 20, 2016 and requested all tax returns, both federal and State for the five years. The Defendant does not find the

information credible. The Defendant has failed to produce documentation for the FIRST SET OF REQUEST FOR PRODUCTION TO DEFENDANT as well as First and Second Interrogatories to Defendant.

3. The League's Constitution, By-Laws, and Rules and Regulations are promulgated by the member schools, which consist of over 400 high schools and middle schools throughout South Carolina. Day-to-day operations of the SCHSL are conducted by the League's staff of approximately 10 individuals. The League serves various purposes in connection with interscholastic athletic programs, including but not limited to the development of programs for athletic competition, and the promotion of uniformity of standards in interscholastic athletic competition. The League governs interscholastic athletic contests in various sports, including football, volleyball, competitive cheer, basketball, wrestling, soccer, track and field, baseball, softball, golf and tennis.

3.

SOUTH CAROLINA BASKETBALL OFFICIALS ASSOCIATION

2015 - 2016

OFFICERS

PRESIDENT ..... SIDNEY GRAY
VICE PRESIDENT ..... MARC TINDAL
SECRETARY ..... PAUL BEHR
PAST PRESIDENT ..... SHELDON BOLDS
OFFICIALS REPRESENTATIVE ..... JOEDY MOOTS
COMMISSIONER ..... SKIP LAX

Article IV THE COMMISSIONER OF OFFICIALS

A. The Executive Committee of the South Carolina High School League shall appoint the Commissioner of Officials. He shall have charge of all records pertaining to the business of the Association.

B. The Commissioner shall receive all applications for membership, which have been approved or disapproved by the director of the district where the applicant resides and the Commissioner shall notify the applicant of the approval or rejection of his application. If the applicant is approved for membership, the Commissioner shall furnish the applicant with a copy of the Constitution, By-Laws, and booking office regulations.

C. The Commissioner shall maintain in his office all reports and records of the members of the Association and the record of an official shall be available to such official at such reasonable time as may be agreed upon by the individual and the Commissioner.

D. The Commissioner shall keep a record of all game assignments and schedules of member schools and shall, upon request of the athletic director or coach of a school, furnish to such school a list of all officials, together with information, which in the opinion of the Commissioner might be relevant in making an impartial and proper selection of game officials.

E. The Commissioner shall furnish each member school a list of the officials.

Article X DISCIPLINE OF OFFICIALS
Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors.

4. As part of my job responsibilities, I have been appointed by the Executive Committee of the SCHSL as the Commissioner of Officials for the South Carolina Basketball Officials Association (SCBOA). I have served in this capacity continuously since the 2010-2011 school year.

4. The Plaintiff needs documentation to support this claim.

5. Under the By-Laws of the SCBOA, the Commissioner of Officials has the following responsibilities: (1) the Commissioner of Officials is in charge of all records pertaining to the business of the SCBOA; (2) the Commissioner of Officials shall receive all applications for membership, which have been previously approved or disapproved by the director of the district where the applicant resides; (3) the Commissioner of Officials will ensure that district directors furnish an accepted applicant with a copy of the Constitution and By-Laws of the SCBOA, along with booking office regulations; (4) the Commissioner of Officials shall maintain all reports and records of the members of the SCBOA; (5) the Commissioner of Officials shall maintain a record of all game assignments and schedules of member schools; and (6) the Commissioner of Officials shall furnish each member school a list of the officials, if requested.

5. The Defendant excluded another professional responsibility he has and therefore the Defendant is attempting to mislead through this major omission which is a part of the complaint communicated by the Plaintiff.

Article X DISCIPLINE OF OFFICIALS
Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors.

6. Each year the SCHSL provides ratings for every basketball official in the state of South Carolina. The rating system is set forth in the By-Laws of the SCBOA and is based on factors such as written examination scores, experience, peer ratings, attendance at clinics and training sessions, and cooperation points. These ratings impact game assignments for basketball officials.

6. The Defendant is attempting to mislead with presenting this information which is irrelevant to the complaint.

7. The SCHSL and the SCBOA use computer software created by ArbiterSports called ArbiterOne to manage scheduling for basketball officials, as well as record-keeping. The SCHSL would have access to ArbiterOne records for all sports officials at the varsity level, including officials who officiate in different sports, while the SCBOA would only have access to the records of basketball officials at the sub-varsity level.

7. The SCHSL is the governing body for all sports, the SCBOA has access to records of Basketball officials at all levels because the members at all levels, there is no separate component as witnessed in the documents under protective order submitted to the Plaintiff concerning members of SCBOA District I. The Defendant is sharing falsehoods with this statement in this affidavit. The Plaintiff believes that the Defendants have altered the documents validity with write in dates or lack thereof.

8. For scheduling of basketball officials at the varsity level, the SCHSL maintains the ArbiterOne software system to make sure that officials are accepting assignments through ArbiterOne. For scheduling of basketball officials at the sub-varsity level, the local districts of the SCBOA maintain the ArbiterOne software to make sure that officials are accepting assignments. Each basketball official has access to their profile on ArbiterOne to set parameters for scheduling contests, such as unavailable dates and times, distance limitations, etc.

8. The Defendants were granted a court order and sent documentation from Arbiter One that is false and supports the complaint of the Plaintiff. The system does not separate SCBOA and SCHSL all are a part of the same system. The Defendants affidavit is objectionable and not credible.
Blair Warren (Adm) (Admin) SCHSL Group ID 101800
Aminah Richburg is blocked by the following SCBOA officials sent on December 16, 2016 (SCHSL 010)

On January 18, 2017, the Plaintiff communicated that she had not received the listing of the ten officials from E.A. Rico Williams. On December 16, 2016 after the Protective Order was granted to the Defendants, The South Carolina High School League sent the names of schools and the names of officials and communicated that these names would not necessarily be the ones referenced in Mr. William's email of February 5, 2016, as these names have only been entered in the Arbiter System used to schedule varsity contest.

The Plaintiff has never officiated a varsity basketball game from 2013-2016. Seven of the names provided by the Defendant (South Carolina High School League) are not members of the South Carolina Basketball Officials Association and are not represented in any basketball district in the state of South Carolina. (00022-00032 Williams), (SCHSL 045-075).

The Defendants Answers to Plaintiff's First Set of Continuing Interrogatories – 17. Provide documentation of all ten officials communicated by E.A. Rico Williams that blocked the Plaintiff in the South Carolina High School league / SCBOA District One.

Response: E. A. Rico Williams -Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL- SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
OFFICIAL 1	NONE		
OFFICIAL 2	NONE		
OFFICIAL 3	(2) 12/11/14 , 1/30/15		11/20/15
OFFICIAL 4	NONE		
OFFICIAL 5	NONE		
OFFICIAL 6	NONE		
OFFICIAL 7	2/2/15		4/4/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (Williams 00038) Protective Order	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) – DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES WITH EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS – NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE)
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) - 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) - 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) - 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 – Game Scheduled no Block

9. Any basketball official may "block" another official from being assigned games with him/her. This is set by the official through ArbiterOne, and no reason for the block is necessary. Additionally, a basketball official may block assignments at a particular school. This is also set by the official through ArbiterOne, and no reason for the block is necessary.

9. The Plaintiff in her complaint communicated that the Defendant created a false narrative with misguided factual information and the Plaintiff has provided proof that the information presented was misguided. The information provided by the SCHSL is marginal and reflects the marginality in the organization representing the state of South Carolina. The Defendant is attempting to mislead with this information and the motion must not be considered or justified with this affidavit.

SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL- SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
OFFICIAL 1	NONE		
OFFICIAL 2	NONE		
OFFICIAL 3	(2) 12/11/14 , 1/30/15		11/20/15
OFFICIAL 4	NONE		
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OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (Williams 00038) Protective Order	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) – DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES WITH EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS – NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE)
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10. A school may block an official for a particular sport or for all sports, and no reason for the block is necessary. As a matter of general practice, the SCHSL will also enter blocks for each official's high school alma mater and for the high school in the attendance zone where the official resides.

10. The Plaintiff in her complaint communicated that the Defendant created a false narrative with misguided factual information and the Plaintiff has provided proof that the information presented was misguided. The information provided by the SCHSL is marginal and reflects the marginality in the organization representing the state of South Carolina. The Defendant is attempting to mislead with this information and the motion must not be considered or justified with this affidavit. The general practice of the SCHSL is reflective in the narrative which the SCHSL ignored despite the plea of the Plaintiff. The Defendant Skip Lax failed to investigate the matter and the Plaintiff has been assigned contest with her alma mater and school in her attendance zone. The Defendants response is objectionable and the motion must be dismissed and not supported by this affidavit.

11. The blocks made by or against an official, either with respect to a member school or another official, are not shared with other officials. This is to promote the integrity of contests and the working relationships of officials and schools who may only be "blocked" in particular sports.

11. The Plaintiff communicated that she has officiated with the same officials for the past three years, the blocking parameters no not promote integrity of contest and the working relationships between officials and officials and schools if no reason is necessary and the statistical information is skewed to terminate an official, defame an official or blight an official. The Defendant is attempting to mislead with this statement. It is his job to investigate a block if it has several consequences on the integrity of an official.

12. I am aware of Rico Williams' statement in his email dated February 5, 2016, that Ms. Richburg had been marked off by ten officials and two schools as of that date. Based on the ArbiterOne records produced by Mr. Williams and the SCHSL, that statement would be true.

12. The Plaintiff in her complaint communicated that the Defendant created a false narrative with misguided factual information and the Plaintiff has provided proof that the information presented was misguided. The information provided by the SCHSL is marginal and reflects the marginality in the organization representing the state of South Carolina. The Defendant is attempting to mislead with this information and the motion must not be considered or justified with this affidavit. The general practice of the SCHSL is reflective in the

narrative which the SCHSL ignored despite the plea of the Plaintiff. The Defendant Skip Lax failed to investigate the matter and the Plaintiff has been assigned contest with her alma mater and school in her attendance zone. The Defendants response is objectionable and the motion must be dismissed and not supported by this affidavit.

SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL- SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
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OFFICIAL 10	(2) - 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 – Game Scheduled no Block

13. According to the ArbiterOne records available to the SCHSL, Ms. Richburg has been marked off by ten officials in other sports at the varsity and sub-varsity level. Some of these occurred after February 2016.

13. The Plaintiff in her complaint communicated that the Defendant created a false narrative with misguided factual information and the Plaintiff has provided proof that the information presented was misguided. The information provided by the SCHSL is marginal and reflects the marginality in the organization representing the state of South Carolina. The Defendant is attempting to mislead with this information and the motion must not be considered or justified with this affidavit. Based on the Arbiter One records produced by Mr. Williams and the SCHSL, that statement would be false.

SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL- SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
OFFICIAL 1	NONE		
OFFICIAL 2	NONE		
OFFICIAL 3	(2) 12/11/14 , 1/30/15		11/20/15
OFFICIAL 4	NONE		
OFFICIAL 5	NONE		
OFFICIAL 6	NONE		
OFFICIAL 7	2/2/15		4/4/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (Williams 00038) Protective Order	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) – DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES WITH EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS – NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE)
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) - 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) - 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) - 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 – Game Scheduled no Block

14. Ms. Richburg has never officiated a basketball contest at the varsity level. Therefore, the SCHSL would not expect for her to have been blocked by other basketball officials at the varsity level. The list of officials' blocks produced by Mr. Williams would be a list of the officials that blocked Ms. Richburg at the sub-varsity level.

14. The Defendant is communicating false information. The list of officials was created by Mr. Williams after the fact and all of the officials are varsity officials, there is no distinction between the two, only the games in which an official is assigned.

The Defendants were granted a court order and sent documentation from Arbiter One that is false and supports the complaint of the Plaintiff. The system does not separate SCBOA and SCHSL all are a part of the same system. The Defendants affidavit is objectionable and not credible.

Blair Warren (Adm) (Admin) SCHSL Group ID 101800
Aminah Richburg is blocked by the following SCBOA officials sent on December 16, 2016
(SCHSL 010)

On January 18, 2017, the Plaintiff communicated that she had not received the listing of the ten officials from E.A. Rico Williams. On December 16, 2016 after the Protective Order was granted to the Defendants, The South Carolina High School League sent the names of schools and the names of officials and communicated that these names would not necessarily be the ones referenced in Mr. William's email of February 5, 2016, as these names have only been entered in the Arbiter System used to schedule varsity contest.
The Plaintiff has never officiated a varsity basketball game from 2013-2016. Seven of the names provided by the Defendant (South Carolina High School League) are not members of the South Carolina Basketball Officials Association and are not represented in any basketball district in the state of South Carolina. (00022-00032 Williams), (SCHSL 045-075).

The Defendants Answers to Plaintiff's First Set of Continuing Interrogatories – 17. Provide documentation of all ten officials communicated by E.A. Rico Williams that blocked the Plaintiff in the South Carolina High School league / SCBOA District One.
Response: E. A. Rico Williams -Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL- SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
OFFICIAL 1	NONE		
OFFICIAL 2	NONE		
OFFICIAL 3	(2) 12/11/14 , 1/30/15		11/20/15
OFFICIAL 4	NONE		
OFFICIAL 5	NONE		
OFFICIAL 6	NONE		
OFFICIAL 7	2/2/15		4/4/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (Williams 00038) Protective Order	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) – DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES WITH EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS – NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE)
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) - 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) - 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) - 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 – Game Scheduled no Block

15. Ms. Richburg emailed me after receiving Mr. Williams' email dated February 5, 2016, requesting various information referenced in the email. Ms. Richburg also referred to Mr. Williams as lacking professionalism and being uncouth, and she stated that she would like a written apology from Mr. Williams. I responded that the SCHSL does not share "blocks" by schools or peers, and I told her that her concerns were a local matter to be handled at her district level. I felt that her concerns were a local matter because she appeared to be primarily concerned with actions of the district director that did not involve varsity scheduling or a specific contest.

15. The Plaintiff communicated in her complaint that the Defendant Skip Lax Commissioner of the South Carolina High School League was negligent in his leadership to properly investigate the allegations made by the Defendant E.A. Rico Williams. The Defendant Mr. Skip Lax disregarded the pleas of the Plaintiff for assistance and only communicated that the South Carolina High School League do not share blocks by schools or peers and also stated that the Plaintiff's concern were a local matter to be handled at the district level. The Defendant Skip Lax response and lack of professional interaction which contradicts what is written in the SCBOA Constitution and By-Laws ; **Article X DISCIPLINE OF OFFICIALS** -Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors. The documentation sent to Mr. Skip Lax involved required his professional assistance his refusal to intervene caused pain and suffering to the Plaintiff amongst other things.

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "skip@schsl.org" <skip@schsl.org>

Tue, Feb 9, 2016 at 4:43 PM

Mr. Lax, I am forwarding this email message sent by Rico Williams which I believe is highly inappropriate for a District One Director. Mr. Williams did not initiate the call because of a High School League Game, he called to confirm games assigned at Furman University through his business.I confirmed the assigned games through a text message initiated by Mr. Williams the previous week. When I returned Mr. Williams phone call, he stated that the games were still on and I responded ok about the games, then Mr. Williams communicated that someone at my previous game told him I had on sweat pants, then he asked if I wore sweat pants and I told him, "I do not wear sweat pants, Is that all? Then Mr. Williams asked the question, if I had a problem discussing my sweat pants and I repeated, " I do not wear sweat pants, Is that all, because I am at work and I need to get off the phone. Mr. Williams responded fine and the conversation ended. Unfortunately the details of our conversation changed with Mr. Williams interpretation in the email he sent to you and several others. I communicated my concerns with a text message to Mr. Williams later because he harassed me and I was obligated to let him know. I now feel that I am being harassed, embarrassed and bullied by Mr. Williams and the email communication he has sent to various individuals proves his lack of professionalism. My meeting attendance has never been a problem with prior leadership or with the current leadership until now. It is true that I attended three meetings this year, I planned to make the fourth meeting, unfortunately, Mr. Williams changed the meeting date and I had a conflict. I met all requirements to officiate basketball games for the SCHL by attending all required meetings. Mr. Williams has shared a lot a damaging information that I did not know concerning my colleagues that have communicated that they did not want to work with me and blocked schools. I know that I blocked CCES and Hillcrest Middle School myself due to personal reasons. If there were any schools that blocked my assignment other than the schools I blocked, I was scheduled that the same schools this year along with some of the same officials. I would like to know the officials that blocked me, it would help me in the future if those same officials officiate other sports. Mr. Williams has his circle of supporters that he has put in leadership positions and many of those individuals character are similar to his. I am an educated professional and sometimes my demeanor may clash with Individuals whose behavior is unprofessional and uncouth. Mr. Williams has no legitimate reason to discuss or set parameters towards my participation with the SCHL or District One Board with my continued participation as a basketball official. Furthermore, I would like Mr. Williams to present a detailed list of arrival times for all District One officials for all meetings.I have done nothing out of character. I would like a written apology from Mr. Williams for his lack of professionalism and the pain and suffering he has caused me.

Aminah A. Richburg

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me. On

Wednedsday Feb 3, I left [redacted] same message as well as a text. After you subsequently called me back I mentioned to you that the games I scheduled for you to work Thursday, Feb. 4 at Furman's Intramural Program were indeed still on, and I informed you that someone at your last game at Beck Middle School on Feb. 2 had told me that you were officiating with "jogging/workout" type pants that were very tight. If you remember, last year during the JV tournament I asked you to wear your official's pants instead of those "jogging" pants whenever you're representing District One and you said you would. When I asked you was that report accurate from Monday you replied, "I don't wear jogging pants. Is that all?" I then asked you if it was problematic for you with me asking that question and your response was, "I don't wear jogging pants. I'm at work. Is that all?" I then stated that we talk again soon.

Even though your responses were short, terse and rude I was going to let the matter rest for another day; until after a few minutes you sent me a lengthy text which follows, and I quote: " Please discontinue the harrassing communications. Previous District One leaders presented a higher level of professionalism which made officating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulatesthe District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I weclome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL".

I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked-of-by-two-schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept . 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 1/2 meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1 member is revlewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc. it is obvious that you feel your

membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route that you deem favorable.

Regards,

E.A."Rico"Williams
Director, District 1
SC Basketball Officials Association
(864 430-9884
Ericowms@charter.net

Skip Lax <skip@schsl.org>
To: aminah richburg <richburga@bellsouth.net> Wed, Feb 10, 2016 at 9:45 AM

Aminah, We do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level.- Sincerely,Skip

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Skip Lax <skip@schsl.org> Thu, Feb 11, 2016 at 1:36 PM

I do not believe my concerns are a district matter and I will hire an attorney to seek relief for my pain and suffering on this matter and communicate the lack of support I am receiving from leadership at the SCHL.
Aminah Richburg

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "jmoots@grayca.com" <jmoots@grayca.com> Tue, Feb 16, 2016 at 10:49 AM

You are listed as the Officials Representative please advise on this matter.
Aminah A. Richburg
richburga@bellsouth.net

16. Joedy Moots was the Officials' Representative on the Executive Committee of the SCHSL in 2015-2016. I am aware that Ms. Richburg also emailed Mr. Moots, but I never spoke with Mr. Moots about this issue.

16. The Plaintiff communicated in her complaint that the Defendant Skip Lax Commissioner of the South Carolina High School League was negligent in his leadership to properly investigate the allegations made by the Defendant E.A. Rico Williams. The Defendant Mr. Skip Lax disregarded the pleas of the Plaintiff for assistance and only communicated that the South Carolina High School League do not share blocks by schools or peers and also stated that the Plaintiff's concern were a local matter to be handled at the district level. The Defendant Skip Lax response and lack of professional interaction which contradicts what is written in the SCBOA Constitution and By-Laws ; **Article X DISCIPLINE OF OFFICIALS** -Discipline of officials

shall be handled through the Commissioner of Officials and the Board of Directors. The documentation sent to Mr. Skip Lax involved required his professional assistance. Mr. Skip Lax continued to perform marginally and unprofessionally when he came to the knowledge that the Plaintiff communicated with the Mr. Joedy Moots, the Officials Association's Representative for the South Carolina High School League's Executive committee and failed to respond. All leaders at the South Carolina High School League and E.A. Rico Williams were in collusion with each other much to the dismay of the Plaintiff.

17. The By-Laws of the SCBOA sets forth the process for an official to appeal a decision of its local Board of Directors. It is my understanding that Ms. Richburg did not pursue an appeal of the District One Board of Directors' decision regarding her future membership.

17. The Plaintiff proactively contacted and pleaded with all individuals in positions of power to appeal the pending termination of her membership communicated by Mr. E.A. Rico Williams which he sent to Board Members and Skip Lax. There is no provided literature giving details of official termination and appeals for termination. The Plaintiff contacted the Commissioner for the SCBOA and he dismissed her plea because he was in collusion with Mr. E.A. Rico Williams. The statement is objectionable and should not have an effect on the motion presented by the Defendant.

18. Ms. Richburg either has officiated or is eligible to officiate League contests in the sports of volleyball, football, softball, and lacrosse for the 2016-2017 school year.

18. The actions of the Defendant's Skip Lax, other members of the South Carolina High School League and E.A. Rico Williams exposed the Plaintiff to public ridicule which caused her to be shunned and avoided. (Recent rejection with the YBOA organization). The Plaintiff has suffered damages from embarrassment, humiliation, mental suffering, lost earning and loss of consortium. The Defendants communicated that the Plaintiff will never be considered for membership with the South Carolina Basketball Officials Association in the future and no application will ever be accepted. The Plaintiff expressed this in her complaint. The Defendant Skip Lax is attempting to misguide with this statement. The Plaintiff ask for relief for the future as stated by the Defendant in loss earnings officiating basketball at the Varsity/Junior Varsity Level per season for the next 25 years according to elder basketball officials compared to the Plaintiff. The Plaintiff's basketball tournaments assignment fee at three hundred and fifty dollars per tournament for eleven tournaments for the next twenty-five years and relief for pain and suffering at one hundred thousand dollars must be considered and loss of fees due to the Defendants actions after February 6, 2016. The Plaintiff officiates volleyball, football, softball and lacrosse to cover the tuition of her daughter at Christ Church Episcopal School and son at Morehouse College.

19. Based on my review of the communications between Mr. Williams and Ms. Richburg, as well as the documentation of the action by the District One Board of Directors, I believe that Mr. Williams and the Board of Directors acted within the scope of their authority as the leadership of District One of the SCBOA. Neither I, nor anyone else from the SCHSL, was present or otherwise involved with the February 29th Board meeting in which Ms. Richburg's status was discussed and voted upon.

19. The Defendants statement is objectionable, the Commissioner of the South Carolina High School League did not fulfil his leadership role to intervene, and therefore his belief is unfounded. Complaint /Answer of Defendant South Carolina High School League 44. For A Thirteenth Defense, 44. The defendant, South Carolina High School league, has not had an opportunity to conduct a sufficient investigation or to engage in adequate discovery touching on the circumstances in the plaintiff's Complaint. The statement is not credible and should not have an influence on the motion presented by the Defendant.

20. I never spoke with anyone outside the SCHSL or SCBOA regarding this issue with the membership of Aminah Richburg in the SCBOA.

20. The Plaintiff has no knowledge of whom Mr. Skip Lax speaks with to determine the validity of this statement and furthermore the statement should not have on influence on the motion presented by the Defendant.

The Affidavit produced by the Defendant Skip Lax is highly objectionable unreliable and invalid and therefore does not support the Notice of Motion and Motion for Summary Judgement by Defendant Skip Lax. The Plaintiff submitted corrections needed for her deposition testimony. The deposition testimony does not support the Memorandum of Law communicated by the Defendant and his counsel.

Respectfully submitted,

Aminah A. Richburg Pro Se

Aminah A. Richburg
217 Plum Creek Lane
Greenville, SC 29607
(864) 419-6707

March 6, 2017

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE AMINAH A. RICHBURG Plaintiff v. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE Defendants	IN THE COURT OF COMMON PLEAS Docket No. : 2016-CP-23-02113 NOTICE TO DISMISS MOTION AND ALSO DISMISS FOR SUMMARY JUDGEMENT BY DEFENDANT SKIP LAX

2017 MAR -6 AM 11:24
FILED-CLERK OF COURT
PAUL B. WICKENSIMER
GREENVILLE CO. SC

TO: E.A. "RICO" WILLIAMS, DIRECTOR, DISTRICT ONE SOUTH CAROLINA BASKETBALL OFFICALS ASSOCIATION, AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, THE ABOVE-NAMED DEFENDANTS:

The Plaintiff, Aminah A. Richburg, herewith serves upon and request that the motion received by mail on March 1, 2017 by the Defendant Skip Lax, by and through his undersigned counsel be dismissed. The Plaintiff pleads with the court that the Complaint filed on March 31, 2016, is supported and substantiated with evidence that the Defendants actions E.A. Rico Williams was enabled by Skip Lax and the behavior of the Defendants caused damages and injuries to the Plaintiff. The Defendants acted with the course and scope of the organization with the knowledge, consent and approval and their conduct was ratified. In particular, at all times material hereto, defendants, individually and through their officers, directors, members, authorized the wrongful conduct alleged in the filed complaint by the Plaintiff, ratified said wrongful conduct and/or were personally guilty of defamation, malice, negligence and/or recklessness. The motion for an Order pursuant to rule 56 of the South Carolina Rules of Civil Procedure against must not be recognized or considered by the court in ten (10) days henceforth or as soon thereafter as counsel may be heard.

The motion requesting an Order pursuant to Rule 56 must be dismissed based on the grounds that the Plaintiff has a generated material facts to support her defamation claim against, Skip Lax, E.A. "Rico" Williams and other members of the South Carolina High School League and all grounds are sustained. The Plaintiff has filed several motions to compel for discovery with the First and Second interrogatories, which the defendants undersigned counsel has failed repeatedly to produce.

The Plaintiff's claim for defamation against the South Carolina High School league does not fail as a matter of law. The Plaintiff can meet and has met the necessary elements of this cause of action.

The Plaintiff's complaint communicates Defendant Skip Lax Assistant Commissioner of the South Carolina High School League was negligent in his leadership to properly investigate the allegations made by the Defendant Mr. E.A. Rico Williams. The Defendant disregarded the pleas of the Plaintiff for assistance and only communicated that the South Carolina High School League do not share blocks by schools or peers and also stated that the Plaintiff's concerns were a local matter to be handled at the district level. The Defendant Skip Lax response gave the Defendant E.A. Rico Williams his support and guidance to continue his unethical behavior towards the Plaintiff and thereby enabled Mr. Williams to thereby proceed with the termination of the Plaintiff's membership as a South Carolina District One basketball official.

The Defendant Skip Lax was professionally negligent for not fulfilling his job requirement according to the South Carolina Basketball Officials Association constitution and by-laws.

Answer of Defendant, South Carolina High School League, May 3, 2016. Answering Paragraph 3 of the Complaint, the defendant, South Carolina High School League, would admit that it is a voluntary association of public and private schools, and as such, it is a governmental entity subject to the South Carolina Tort Claims Act. Section f. The defendant, South Carolina High School League, would admit that Mr. Lax communicated to the Plaintiff that the South Carolina High School League did not share "blocks" by schools or peers with officials and that Plaintiff's concerns needed to be handled at the district level but denies that this communication was defamatory, negligent, or otherwise legally actionable and demands strict proof thereof.

South Carolina Basketball Officials Association states in Article X Discipline of Officials- Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors.

Discipline of Officials – Officials associations may set up rules and regulations for the discipline of its members. The legislative assembly of the South Carolina High School League is of the opinion that the final authority of discipline for both schoolmen and athletic game officials must be centralized and that the centralized authority will be the Executive Director of the league. The Executive director has the authority to discipline the official in one or more of the following manners:

Warning – this is an official notice that an inexcusable, unethical or unsportsmanlike action is a matter of record and must not happen again.

Probation – this is a more severe type of warning. An official on probation may be assigned to regularly scheduled games but he will not be assigned to a play-off game for a conference championship, a play-off game toward the state championship or a tournament of any type.

Suspension – a suspended official may not work an interscholastic athletic contest of any kind for a member of the South Carolina High School league or a school that is a member of another state associated with the National Federation of State High School Athletic Associations.

Fine – a fine may be levied separately or in addition to a warning, probation or suspension. It will be levied against the official and may range from the fee received for working the game up to a maximum of $100.00. Any disciplinary action by SCBOA or the Executive Director may be appealed to the Executive Committee of the High School league.

Officials Liability Insurance – Liability insurance is covered under NFOA membership. (Up to one million dollars individual liability protection from suits arising from officiating duties and paying for legal fees as well as any assessment or damage awards.) Medical coverage is available through the national federation office.

Complaint /Answer of Defendant South Carolina High School League 44. For A Thirteenth Defense

44. The defendant, South Carolina High School league, has not had an opportunity to conduct a sufficient investigation or to engage in adequate discovery touching on the circumstances in the plaintiff's Complaint.

The motion is not supported by the affidavit of Skip Lax, Assistant Commissioner and Commissioner of officials of the South Carolina High School league.

The Plaintiff pleads for empathy from the court. The Plaintiff has filed plenty of motions to compel the Defendants to provide discovery information with the First and Second Interrogatories submitted by the Plaintiff since October of 2016 and the Defendants have not cooperated by sending the documentation. The Plaintiff filed for the first Motion to Compel and once the hearing date was granted, the Defendants filed a motion for a Protection Order and the Motion originated by the Plaintiff was not addressed by the court during the hearing and the sitting judge did not have the proper documentation at the hearing for the Protection Order nor the Motion to Compel and asked for the submission of documents after the hearing. The Plaintiff asked if she could also submit a motion to dismiss the protection order and was told she could do so and

that she was required to submit the document to the court and to the Defendants which she did. The court did not give an explanation as to why the Protection order was granted, only communicated that the Plaintiff did not e-file the documents. The Plaintiff has since then filed a motion to dismiss the Protection Order citing that she did not have the capabilities to E-file and furthermore she used the e-mail communication that is available to her.

Presently, the Plaintiff submitted another Motion to Compel and the hearing was communicated to take place on March 20, 2017 at 3:00 pm. The Defendants have submitted a motion as well to be heard on the same date and were granted a hearing on the motion on March 20, 2017 at 3:00 pm. The Plaintiff fears that she will experience the identical scenario experienced in October in 2016 and ask if the court sees fit to recognize this motion, the hearing should be set on another date due to the sensitivity and importance of the Plaintiff's motion. The Plaintiff is submitting this motion to dismiss the motion of the Plaintiff. The Defendants are asking for an order to dismiss the Complaint on the grounds that the Plaintiff cannot meet the necessary elements of this cause of action. The Plaintiff can meet the necessary elements of this cause of action. The factual documentation requested by the Plaintiff in the First and Second Interrogatories are highly important to the Plaintiff. The Plaintiff has gleaned the Affidavits provided by the Defendants and provided documentation that support the objectionable testimony communicated by the Defendants and pray that the court will not find the testimony to be supportive based on the motion provided by the Defendants.

Respectfully submitted,

Aminah A. Richburg Pro Se

Aminah A. Richburg
217 Plum Creek Lane
Greenville, SC 29607
(864) 419-6707

March 6, 2017

Archived Document of March 9, 2017

No document exist – Code for Greenville County 13th Judicial Circuit Public Index

Appellate Request for Admission, April 25, 2017

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	Docket No.: 2016-CP-23-02113
COUNTY OF GREENVILLE	)	
AMINAH A. RICHBURG	)	
Plaintiff	)	**REQUEST FOR ADMISSION**
	)	
vs.	)	
E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE	)	
Defendants	)	

FILED-CLERK OF COURT PAUL B. WICKENSIMER GREENVILLE, SC 2017 APR 24 PM 4:59

TO: Sarah Day Hurley, Esquire attorney for E.A. Rico Williams and J. Michael Montgomery attorney for the South Carolina High School League:

The Plaintiff Pro Se, Aminah A. Richburg, herewith serves upon and request that the Defendants respond to the REQUEST FOR ADMISSION on or before April 20, 2017.

REQUEST NO. 1: Admit that the statements communicated in (Williams 00004-00005) listed were falsely created by the Defendant E.A. Rico Williams , If you remember last year during the J.V. tournament, I asked you to wear your officials pants instead of those "jogging pants whenever your representing District One and you said you would. When I asked you was that report accurate from Monday, you replied" and "I then stated we would talk again soon - (Affidavit of E.A. Rico Williams – Received on March 1, 2017 – 25)." When she called me back, I informed her that someone reported that she was wearing tight jogging pants to officiate the game at Beck Middle School on February 2. When I asked her if the report was true, she curtly replied "I don't wear jogging pants. Is that all? I then asked her if it was problematic for her with me asking that question. She then stated "I don't wear jogging pants. I'm at work, Is that all?" I did not dispute her response and stated that we would talk again soon. Although Ms. Richburg's' response to me was short terse and rude, I decided to let it go.)

Admit the statements in the (Williams 00004-00005) communicated above, is a false representation of the conversation and also state and agree that there are no official pants according to the By-Laws and Constitution of the SCBOA and the Plaintiff wore the official uniform for the game on November 2, 2016 as supported by Article XI Uniform- South Carolina Basketball Officials Association.

The Plaintiff wore an official uniform for all games from 2013 -2016. Article XI Uniforms – South Carolina Basketball Officials Association

a. Each official shall have a complete standard uniform, which shall be as follows:

1. Black and white vertically striped v-neck short sleeve knit shirt. Straight leg black trousers without cuffs. (Trousers may be pleated or plain.)

2. Black official shoes (if low cut shoes are worn, officials must wear black socks). A black shoe with a white trim may be worn if all officials wear them.

ENTERED COMPUTER

3. Black jacket made of wool or nylon, without a hood, and with or without a waistband.

b. The SCBOA or any district may, as a memorial, place a patch or band on their left shirt sleeve for a period of one year, for each memorial situation.

REQUEST NO. 2: Admit that during the 2015-2016 Basketball season the Plaintiff was not marked by ten basketball officials higher rated either Sub-Varsity Basketball / Varsity Basketball Officials communicated by E.A. Rico Williams (WILLIAMS 00004-00005) and ten basketball officials did not approach E.A. Rico Williams during the 2015-2016 Basketball season and communicate the Plaintiff's unwillingness to accept constructive criticism, advice, instruction, or any information given by them that the Plaintiff may deem unnecessary as communicated by E.A. Rico Williams (WILLIAMS 00004-00005).

REQUEST NO. 3: Admit that there are no official records/no official documents for arrival times for all South Carolina Basketball Officials Association District One Members for all meetings and SCHSL Basketball Regional meetings from 2013-2016 any documents depicting arrival times of the Plaintiff along with names of other SCBOA members presented were created and they are not official representing all arrival times of all members of the SCBOA District One or SCHSL member meetings.

REQUEST NO. 4: Admit that the SCBOA District I released assignment of games to the Plaintiff for the 2015-2016 basketball season, therefore she was in compliance for the 2015-2016 Basketball Season and her communication with Mr. E.A. Rico Williams in February and Mr. E.A. Rico Williams false narrative shared with the leadership with the leadership of the South Carolina High School League and Board Members of SCBOA District One in February along with the lack of intervention from leadership from the South Carolina High School League, led to the termination of the Plaintiff's future membership with the SCBOA .

REQUEST NO. 5: Admit that the Plaintiff conducted herself in a professional manner and met all professional standards as a SCBOA District One Basketball Official for the 2015-2016 basketball season.

REQUEST NO. 6: Admit that the Plaintiff followed all requirements listed in the SCBOA District I Code of Ethics / SCBOA District One Contract for the 2015-2016 basketball season.

REQUEST NO. 7: Admit that the SCHSL nor E.A. Rico Williams did not communicate to the Plaintiff that she did not meet the requirements for membership and her status as a District One Member of SCBOA was under review by the Board of Directors before the 2015-2016 basketball season began and assigned the Plaintiff basketball scrimmages during the summer, basketball scrimmages in the fall and assigned the Plaintiff games for 2015-2016 basketball season indicating that she was in compliance with all SCBOA District One requirements for the 2015-2016 basketball season.

REQUEST NO. 8: Admit the Non-SCBOA schedule provided by E.A. Rico Williams does not reflect all assignments for all games and the officials that worked with her.

REQUEST NO. 9: Admit that the Defendant Joedy Moots official's representative shared confidential communications with the Plaintiff and the privileged communications were read at the Board meeting which was unethical and unprofessional.

REQUESTNO. 10: Admit that defendants Skip Lax and Joedy Moots failed to properly represent the Plaintiff according to the SCBOA Constitution and By-Laws and the SCBOA Constitution and By-Laws do not provide instructions on how to appeal termination.

Respectfully submitted,

Aminah A. Richburg Pro Se / Plaintiff

217 Plum Creek Lane

Greenville, SC 29607

864-419-6707

arichbur@greenville.k12.sc.us

Greenville, South Carolina

April 24, 2017

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE AMINAH A. RICHBURG Plaintiff vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE Defendants	IN THE COURT OF COMMON PLEAS Docket No. : 2016-CP-23-02113 **MEMORANDUM IN SUPPORT TO DISMISS THE SOUTH CAROLINA HIGH SCHOOL LEAGUE'S OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL AND DISMISS THE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

FILED-CLERK OF COURT
PAUL B. HICKS
GREENVILLE
2017 APR 24 PM 4:18
SCANNED

Plaintiff Aminah A. Richburg submits this Memorandum in Support to Dismiss the South Carolina High School League's opposition to Plaintiff's Motion to Compel and Dismiss the Defendant's Motion for Summary Judgment. A hearing was held on March 20, 2017 at 3:00 p.m.

Plaintiff's Response

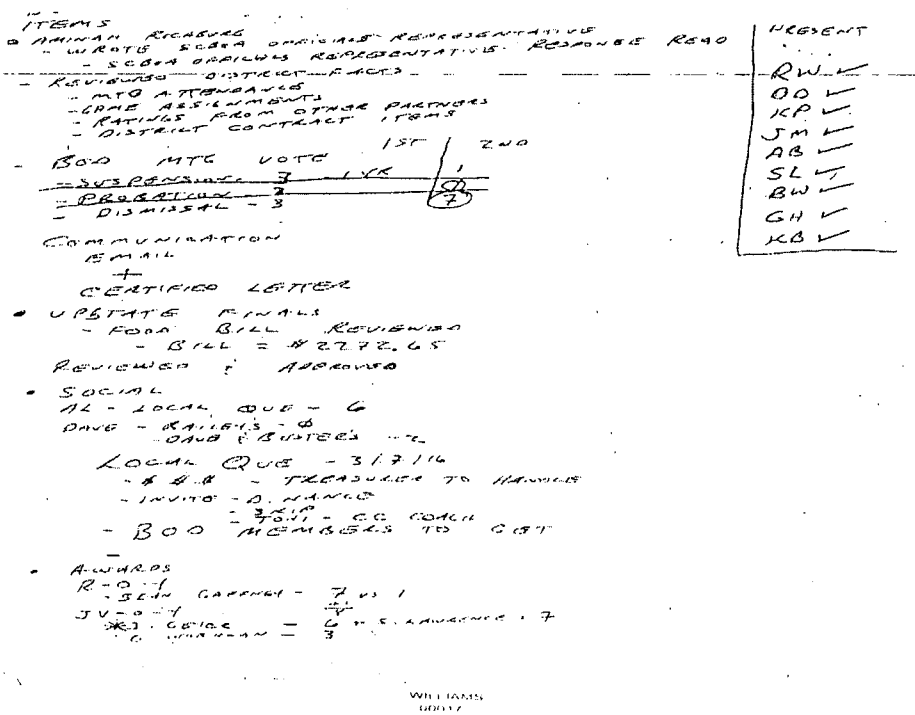
The Plaintiff has addressed the defamatory email sent by the Defendant Rico Williams sent to SCHSL Leaders and members of the SCBOA Board to terminate the membership of the Plaintiff Aminah A. Richburg. The Defendant purposefully created a false narrative to influence and direct the behavior of all individuals and ultimately through abuse of his position as District One Director masterminded the termination of the Plaintiff. The communication was not made in good faith. The subject matter was between the Plaintiff and the Defendant Rico Williams through which the Plaintiff had a right as a human being to communicate her dismay with the behavior of the Defendant Rico Williams. The Defendant Rico Williams behavior was not in good faith and the interest of the SCBOA District One was not an interest to be upheld or occasion to support the sharing of the communication. The Plaintiff did nothing to cause detriment to the organization, the purpose of the email communication sent by the Defendant Rico Williams was only defamatory in nature. During the previous telephone conversation between the Plaintiff and the Defendant Rico Williams, the Defendant did not communicate a need to use his authority to enforce professional standards or suggest that the Plaintiff remittance to the SCBOA District One would be reviewed with the contingency for the Plaintiff to transfer to another basketball district.

The Defendant sent the email only to communicate to other Board Members that violate the SCBOA District One Contract – Line 24 – I agree that I will not use the District One Membership for solicitation purposes, that we need to terminate the membership of the Plaintiff because she is challenging the behavior and influence of the current District One Director Rico Williams. For the past three years, many members of the SCBOA District One Board have officiated games assigned by Rico Williams not affiliated with the South Carolina High School League with the Plaintiff. The Plaintiff has requested this documentation and written several motions to compel for this information, the Defendants have not provided this information. Again, the Plaintiff has a right as a human being to communicate her dismay with Defendant Rico Williams. The remarks made by the Plaintiff were professional and her conduct at all times when representing the SCBOA District One/South Carolina High School League are professional as well. The behavior of the Plaintiff did not warrant the unprofessional defamatory disciplinary actions taken by the Defendant

ENTERED COMPUTER

Rico Williams against the Plaintiff. The Defendant Rico Williams exerted his positional power when he stated you will not be considered for any future assignments until your status as a District One member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning professionalism, declining standards, etc, it is obvious that you feel your membership is not being served adequately by the present leadership. I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facility the communication to any District in South Carolina that you choose if that is the route that you deem favorable. The Defendant Rico Williams statements were communicated with malice and disdain along with an exertion of positional power. The conversation nor the communications between the Defendant Rico Williams and the Plaintiff required and disciplinary action because initially it wasn't a disciplinary issue when the first conversation took place between the Defendant Rico Williams and the Plaintiff. The Defendant Rico Williams did not extend an "olive branch" previously described by his legal counsel through his communications and the statements were not made in good faith. All actions performed by all Defendants, Rico Williams and leadership at the high school league were defamatory in nature and it continuously brings a multitude of pain and suffering to the Plaintiff. The Defendants continuous refusal to cooperate in the discovery process by supplying all information communicated in the First and Second Interrogatories supports their heresy when communicating the Plaintiff's lack of evidence.

The Plaintiff challenges the authenticity of the document presented that the Defendant Rico Williams presented to support the Plaintiff's termination from SCBOA. It has been altered and the vote does not reflect what was communicated by Defendant Rico Williams. Visible tort by Defendants in the Document itself.



The SCHSL had a duty to oversee the actions of the Defendant Rico Williams in all matters.

SOUTH CAROLINA BASKETBALL OFFICIALS ASSOCIATION
2015 - 2016

OFFICERS

PRESIDENT ..... SIDNEY GRAY
VICE PRESIDENT ..... MARC TINDAL
SECRETARY ..... PAUL BEHR
PAST PRESIDENT ..... SHELDON BOLDS
OFFICIALS REPRESENTATIVE ..... JOEDY MOOTS
COMMISSIONER ..... SKIP LAX

DIRECTORS

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1 Ridgeside Ct
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(H) 864-294-0857
Ericowins@charter.net

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(C) 8640200-5007
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803-727-3921 (C)
803-834-4112 (H)
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(H) 843-479-5356
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COMMISSIONER
Skip Lax
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Columbia, SC 29221
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(W) 803-798-0120
skip@schsl.org

OFFICIALS REPRESENTATIVE
Joedy Moots
141 Switch Grass Dr
Leesville, SC 29070
(H) 803-896-3527
(C) 803-521-0720
jmoots@grayco.com

Article X DISCIPLINE OF OFFICIALS

Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors.

RESPONSIBILITIES OF THE OFFICIALS

Officials should:

- Maintain a neat appearance, and be friendly but businesslike.
- Know fully the rules and accepted officiating procedures.
- Make decisions promptly, fairly, and without arrogance.
- Be consistent.
- Eliminate showboating in officiating.
- Be on time and start the game on time.
- Refrain from placing hands on players during an athletic contest.
- Work together with other officials. A pre-game conference prior to each game is a must.

DISCIPLINE OF OFFICIALS

Officials associations may set up rules and regulations for the discipline of its members. The legislative assembly of the South Carolina High School League is of the opinion that the final authority of discipline for both schoolmen and athletic game officials must be centralized and that this centralized authority will be the Executive Director of the league. The Executive Director has the authority to discipline the official in one or more of the following manners:

Warning - this is an official notice that an inexcusable, unethical or unsportsmanlike action is a matter of record and must not happen again.

Probation - this is a more severe type of warning. An official on probation may be assigned to regularly scheduled games but he will not be assigned to a play-off game for a conference championship, a play-off game toward the state championship or a tournament of any type.

Suspension - a suspended official may not work an interscholastic athletic contest of any kind for a member of the South Carolina High School League or a school that is a member of another

state associated with the National Federation of State High School Athletic Associations.

Fine - a fine may be levied separately or in addition to a warning, probation or suspension. It will be levied against the official and may range from the fee received for working the game up to a maximum of $100.00. Any disciplinary action by SCBOA or the Executive Director may be appealed to the Executive Committee of the High School League.

Summary judgment is not appropriate, (1) the Defendants the SCHSL made communications that were defamatory, (2) the communications were not protected by defenses of qualified privilege and truth, and privileged communicated were shared and distorted by the Defendants evidenced in the Meeting Minutes for SCBOA District One Board Members, (3) the negligence of the South Carolina High School League is actionable.

The Plaintiff contacted Skip Lax due to information provided on the South Carolina High School League website for basketball officials. The Defendant Skip Lax's lack of participation contradicts his responsibilities stated in the by-laws and constitution for South Carolina Basketball Officials. The Defendant conspired with Rico Williams and contributed to the defamation of the Plaintiff.

aminah richburg <rechburga@bellsouth.net>
Reply-To: aminah richburg <rechburga@bellsouth.net>
To: "skip@schsl.org" <skip@schsl.org>

Tue, Feb 9, 2010 at 4:43 PM

Mr. Lax, I am forwarding this email message sent by Rico Williams which I believe is highly inappropriate for a District One Director. Mr. Williams did not initiate the call because of a High School League Game, he called to confirm games assigned at Furman University through his business.I confirmed the assigned games through a text message initiated by Mr. Williams the previous week. When I returned Mr. Williams phone call, he stated that the games were still on and I responded ok about the games, then Mr. Williams communicated that someone at my previous game told him I had on sweat pants, then he asked if I wore sweat pants and I told him, "I do not wear sweat pants, is that all? Then Mr. Williams asked the question, if I had a problem discussing my sweat pants and I repeated, " I do not wear sweat pants, is that all, because I am at work and I need to get off the phone. Mr. Williams responded fine and the conversation ended. Unfortunately the details of our conversation changed with Mr. Williams interpretation in the email he sent to you and several others. I communicated my concerns with a text message to Mr. Williams later because he harassed me and I was obligated to let him know. I now feel that I am being harassed, embarrassed and bullied by Mr. Williams and the email communication he has sent to various individuals proves his lack of professionalism. My meeting attendance has never been a problem with prior leadership or with the current leadership until now. It is true that I attended three meetings this year. I planned to make the fourth meeting, unfortunately. Mr. Williams changed the meeting date and I had a conflict. I met all requirements to officiate basketball games for the SCHL by attending all required meetings. Mr. Williams has shared a lot a damaging information that I did not know concerning my colleagues that have communicated that they did not want to work with me and blocked schools. I know that I blocked CCES and Hillcrest Middle School myself due to personal reasons. If there were any schools that blocked my assignment other than the schools I blocked, I was scheduled that the same schools this year along with some of the same officials. I would like to know the officials that blocked me, it would help me in the future if those same officials officiate other sports. Mr. Williams has his circle of supporters that he has put in leadership positions and many of those individuals character are similar to his. I am an educated professional and sometimes my demeanor may clash with individuals whose behavior is unprofessional and uncouth. Mr. Williams has no legitimate reason to discuss or set parameters towards my participation with the SCHL or District One Board with my continued participation as a basketball official. Furthermore, I would like Mr. Williams to present a detailed list of arrival times for all District One officials for all meetings.I have done nothing out of character. I would like a written apology from Mr. Williams for his lack of professionalism and the pain and suffering he has caused me.

Aminah A. Richburg

Skip Lax <skip@schsl.org>
To: aminah richburg <richburga@bellsouth.net>
Wed, Feb 10, 2016 at 9:45 AM

Aminah, We do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level.- Sincerely,Skip

From: "aminah richburg" <richburga@bellsouth.net>
To: skip@schsl.org
Sent: Tuesday, February 9, 2016 4:43:15 PM
Subject: Fw: Information for Official
[Quoted text hidden]

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Skip Lax <skip@schsl.org>
Thu, Feb 11, 2016 at 1:36 PM

I do not believe my concerns are a district matter and I will hire an attorney to seek relief for my pain and suffering on this matter and communicate the lack of support I am receiving from leadership at the SCHL.
Aminah Richburg
[Quoted text hidden]

aminah richburg <nchburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "jmoots@grayca.com" <jmoots@grayca.com>
Tue, Feb 16, 2016 at 10:49 AM

You are listed as the Officials Representative please advise on this matter.
Aminah A. Richburg
richburga@bellsouth.net

The Plaintiff contacted the Defendant Mr. Joedy Moots and his lack of intervention led to the defamation of the Plaintiff. The response from the Defendant clearly reflects the interpretation of the false narrative communicated by the Defendant Rico Williams. The Defendant Mr. Joedy Moots acted unprofessionally when he shared some but not all of his communications with the Defendant Rico Williams which were discussed at the Board Meeting, indicated in writing. The communication was utilized to defame the Plaintiff. Mr. Moots communicated that he would love to talk to the Plaintiff but failed to represent her according to his position.

Aminah Richburg

Inbox x
richburga@bellsouth.net x
richburga@bellsouth.net/Sent x

aminah richburg <richburga@bellsouth.net> 2/17/16

to jmoots

Joedy Moots, I forwarded and email that describes a dilemma I am experiencing right now as a basketball official. Please respond and let me know you are aware of my circumstances and what is my position or rights in this matter with Rico Williams, District 1.

Joedy Moots <jmoots@grayca.com> 2/17/16

to aminah

I received your email. I have been in district meetings the past two day. I will review what you sent and get back with you by tomorrow.

aminah richburg <richburga@bellsouth.net> 2/17/16

to Joedy

Thank you

Joedy Moots <jmoots@grayca.com> 2/22/16

to aminah

Ms Richburg,

I have read the corresponding email from your Director, Rico Williams. I have also reviewed your text to Mr. Williams as well. I have always had respect for our states district directors and the high school league office. Being the officials representative the past four years has been very rewarding to me, but has opened my eyes with even more respect and admiration for both the league and directors. In my real line of work, I am a high school principal and have been in administration for over 20 years. In a way, that is what a director is. The officials in their district are their staff and they are responsible for them. Always dress professional with a clean uniform because you are not only representing yourself, but your district and state as well. I am going to say some things that you are probably not going to like, but if you ask anyone about me, I will always be brutally honest.

As far as Mr. Williams, he is one of the most respected officials and directors in the state. I have never known him as being anything but sincere, honest and professional. I have had disagreements with him myself, but in all my dealings with him, he was professional and respectful. In reading the correspondence from him to you, I feel all his responses were merited. It seems you are having trouble with fellow officials and other schools. It looks to me that Mr. Williams has gone the extra mile to help you advance in your officiating career.

As an administrator, if one of my employees talked about me like you did about Mr. Williams, they would be put on leave for insubordination. I have never seen you work so I cannot comment on your officiating ability but I do want to give you some advice. None of us are in this for the money, we are in it for the love of sport and the love of kids. The game is bigger than us and once we are gone, the game will go on. Get along with your peers and administrators. Be an official that everyone wants to work with and have you on their games. There will always be officials and coaches you don't necessarily like, but they should never know it.

I also agree with Mr. Williams that if you are still serious about officiating, you should try another district, especially after your accusations about your director. Be careful not to burn many bridges in your journey through officiating and life, you never know when you will need to cross one to advance or continue growing.

Best of luck in all you do!

Joedy

minah richburg <richburga@bellsouth.net> 2/23/16

to Joedy

Mr. Moots, I am disappointed with your response and I believe that you response is prejudiced on Mr. Williams behalf. I have not communicated with anyone except Mr. Williams. It was Rico Williams that sent all written communications, I merely forwarded the communications to you. I have a right as a human being to communicate to anyone when I have been harassed. Mr. Williams asked if I wore sweat pants and I communicated to him that I do not wear or own sweat pants is that all. I am always dressed professionally and clean according to the SCHL officials dress code requirement. Unfortunately, Mr. Williams has contracted numerous recreation organizations that require sports officials in the Greenville area where I reside and his position I felt was a conflict of interest with his position with the South Carolina High School League whereas he is able to control officiating opportunities and further use his position of power. I have not had any problems with any officials when I have been assigned games and I have not had any problems at any schools. My assignments have not changed at all and I have officiated games at the same schools for the past three years. The only blocks that I am aware of are blocks I have created in the system. Mr. Williams is not attempting to help me at all, in fact his behavior and communications have been destructive. If there was a problem, it was never communicated and as I stated before, my assignments have not changed in the past three years. I have officiated games in the same schools with the same officials every year. Changing officiating districts will create a personal burden for me. I am a professional and I get along with all officials I work with and administrators. Again Mr. Moots, I am disappointed with your response which is personal and biased on behalf of Mr. Williams. I am quite sure that if you take time and review all of the documentation presented on my behalf as my Officials Representative and also take time to review my assigned games for the past three years, you will see that Mr. Williams responded unprofessionally towards me as the District One Director. Your accusable statement to insubordination on my part is unfounded and unmerited. I only sent one text message to Rico Williams communicating my response to his previous cellular phone call, which I have a right to do as a human being. Mr. Williams began the conversation with communicating with me that I will be assigned to officiate games at Furman University and I responded that I sent him a text earlier acknowledging the assignment then Rico Williams stated that someone told him that I had on sweat pants for a previously assigned game with the SCHL. I told Mr. Williams that I do not wear or own sweat pants is that all. My statement was not disrespectful and my text only communicated my position on how Mr. Williams began the conversation by discussing his personal officials assigning business and followed up with disrespect and harassment by asking me if I wore sweat pants to a previous SCHL game. It is evident that I have done nothing wrong and my officiating skills, officiating dress and level of professionalism were not a problem until I communicated my disdain to Rico Williams. At this point, I only sought unbiased representation from my Officials Representative, unfortunately the officials representative responded like a District Director's representative. Please communicate my position as a District One Basketball Official for District One for 2016-2017, Mr. Williams stated that I was not in compliance for some reason after my recent text communication, I did not receive any communication before the 2015-2016 Basketball Season began that I was not in compliance. Mr. Moots, I want you to know that I am a professional at all times all communications are considered business on my behalf nothing is personal.

Joedy Moots <jmoots@grayca.com> 2/23/16

to aminah

Aminah,

You are correct, I only went on what was said in the emails and text. I didn't mean you were insubordinate but that if one of my staff talked to me like that, I would consider it insubordination. Believe me, the basketball directors and I have gotten into many disagreements because I am always taking up for my officials. But you can't win am argument with your director because they have too much power within the organization. You have to find a way to get along. Like I said, I have no knowledge of your officiating ability. I can definitely see there is a personality conflict and the best thing you can do is go to a different district. If I were you, in a respectful way, I woukd ask him to elaborate on his accusations about schools and officials marking you off. You seem like an extremely intelligent young lady and I hope you stick with officiating because we need more females in sports. I really cant help you with Rico. But if there is anything I can do for you, I would gladly help. I am hoping I get assigned the upper state finals this weekend. If I do, I will be at all games. I will be in the officials suite. I woukd love to sit down and talk to you.

aminah richburg <richburga@bellsouth.net> 2/24/16

to Joedy

I appreciate your honesty, I will not seek officiating opportunities in a different district because I work and live in the Greenville area and the distance required to officiate in nearby counties will be burdensome. I will pay my registration for District One as I have for the past three years. Rico is an ignorant man and he displayed his lack of professionalism and leadership ability as the District One Director.

Plaintiff Response

Rule 56 of the South Carolina Rules of Civil Procedure that allows the Court to enter summary judgment is not applicable for the Defendant Rico Williams and the SCHSL, the Plaintiff has provided a genuine issue of material fact. The issues presented by the Plaintiff exist and they are triable. The Plaintiff continues to appeal to the court to view all evidence presented by the Plaintiff and compel the Defendants to present all information requested by the Plaintiff. The lack of cooperation from the Defendant's Rico Williams and the South Carolina High School League in providing all discovery information requested by the Plaintiff has detrimentally curtailed supportive facts to be presented for trial.

The Plaintiff's Complaint is justified and must not be dismissed because (1) the statements made by Mr. Williams in the February 5, 2016 email were not true, and (2) the statements made by Mr. Williams in the February email were not subject to a qualified privilege.

The Statements Made by Rico Williams in the February 5, 2016 Email communicating the Plaintiff's attendance to meetings were not true. The evidence presented by Rico Williams and the South Carolina High

School League have been created by the Defendants none of the documents presented are authentic and furthermore the documents have been manipulated fictitiously to support the continuous defamation of the Plaintiff. Any statements in Affidavits communicated by Defendants Rico Williams and the South Carolina High School League must not be honored.

The Plaintiff attended the required four meetings for the 2015-2016 Basketball Season and met all requirements according to the SCBOA District One Contract and Code of Ethics supported by the assignment of games she received during the 2015-2016 Basketball Season. All statements made by the Defendant are not true. The Plaintiff has requested discovery for all sign in sheets that document the arrival times for all SCBOA District One Officials for all meetings and South Carolina High School League meetings for the past five years. The Plaintiff's repeated Motion to Compel have not been supported by the court or the Defendants, the Plaintiff has yet to receive any documentation. The Defendants presented a recent created table with selected names indicating meeting attendance along with arrival and departure times. The document presented is not authentic evidence and any presented information cannot be trusted or verified.

There is no way to determine the validity and reliability of the statement communicated by E.A. "Rico" Williams on or about February 2, 2016 /later that day Rico Williams received information from another official. E.A. Rico Williams continuous fiction narratives based on hearsay is objectionable.

The statement presented along with the Affidavit of E.A. "Rico" Williams, Deposition Testimony of the Plaintiff by which the Plaintiff Requested Corrections, are not applicable to common and statutory law of South Carolina along with supporting Memorandum of Law.

The Plaintiff wore an official uniform for all games from 2013 -2016. Article XI Uniforms – South Carolina Basketball Officials Association

a. Each official shall have a complete standard uniform, which shall be as follows:
    1. Black and white vertically striped v-neck short sleeve knit shirt. Straight leg black trousers without cuffs. (Trousers may be pleated or plain.)
    2. Black official shoes (if low cut shoes are worn, officials must wear black socks). A black shoe with a white trim may be worn if all officials wear them.
    3. Black jacket made of wool or nylon, without a hood, and with or without a waistband.
b. The SCBOA or any district may, as a memorial, place a patch or band on their left shirt sleeve for a period of one year, for each memorial situation.
c. **Plaintiff Response**
d. **The Plaintiff has addressed the defamatory email sent by the Defendant Rico Williams sent to SCHSL Leaders and members of the SCBOA Board to terminate the membership of the Plaintiff Aminah A. Richburg. The Defendant purposefully created a false narrative to influence and direct the behavior of all individuals and ultimately through abuse of his position as District One Director masterminded the termination of the Plaintiff. The communication was not made in good faith. The subject matter was between the Plaintiff and the Defendant Rico Williams through which the Plaintiff had a right as a human being to communicate her dismay with the behavior of the Defendant Rico Williams. The Defendant Rico Williams behavior was not in good faith and the interest of the SCBOA District One was not an interest to be upheld or occasion to support the sharing of the communication. The Plaintiff did nothing to cause detriment to the organization, the purpose of the email communication sent by the Defendant Rico Williams was only defamatory in nature. During the previous telephone conversation between the Plaintiff and the Defendant Rico Williams, the Defendant did not communicate a need to use his authority to enforce professional standards or suggest that the Plaintiff remittance to the SCBOA District One would be reviewed with the contingency for the Plaintiff to transfer to another basketball district.**

e. The Defendant sent the email only to communicate to other Board Members that violate the SCBOA District One Contract – Line 24 – I agree that I will not use the District One Membership for solicitation purposes, that we need to terminate the membership of the Plaintiff because she is challenging the behavior and influence of the current District One Director Rico Williams. For the past three years, many members of the SCBOA District One Board have officiated games assigned by Rico Williams not affiliated with the South Carolina High School League with the Plaintiff. The Plaintiff has requested this documentation and written several motions to compel for this information, the Defendants have not provided this information. Again, the Plaintiff has a right as a human being to communicate her dismay with Defendant Rico Williams. The remarks made by the Plaintiff were professional and her conduct at all times when representing the SCBOA District One/South Carolina High School League are professional as well. The behavior of the Plaintiff did not warrant the unprofessional defamatory disciplinary actions taken by the Defendant Rico Williams against the Plaintiff. The Defendant Rico Williams exerted his positional power when he stated you will not be considered for any future assignments until your status as a District One member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning professionalism, declining standards, etc, it is obvious that you feel your membership is not being served adequately by the present leadership. I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facility the communication to any District in South Carolina that you choose if that is the route that you deem favorable. The Defendant Rico Williams statements were communicated with malice and disdain along with an exertion of positional power. The conversation nor the communications between the Defendant Rico Williams and the Plaintiff required and disciplinary action because initially it wasn't a disciplinary issue when the first conversation took place between the Defendant Rico Williams and the Plaintiff. The Defendant Rico Williams did not extend an "olive branch" previously described by his legal counsel through his communications and the statements were not made in good faith. All actions performed by all Defendants, Rico Williams and leadership at the high school league were defamatory in nature and it continuously brings a multitude of pain and suffering to the Plaintiff. The Defendants continuous refusal to cooperate in the discovery process by supplying all information communicated in the First and Second Interrogatories supports their heresy when communicating the Plaintiff's lack of evidence.

The Defendant Mr. Rico Williams has been a member of the South Carolina High School League for twenty years or more and created a fictitious narrative when he communicated that ten or more officials approached him during the 2015-2016 Basketball season to communicate that the Plaintiff Aminah A. Richburg communicated her unwillingness to accept constructive criticism, advice, instruction or any information given by them that she may deem unnecessary. During the 2015-2016 Basketball season ten officials did not approach the Defendant Rico Williams as District One Director communicated in the Defamatory Email. "From our records communicated by Rico Williams you were marked off by two schools and ten officials and literally every one of them are higher rated either sub-varsity, or varsity level who still work JV games".

The Defendant communicated that he has been a member of the SCBOA for twenty or more years yet, The Defendants Answers to Plaintiff's First Set of Continuing Interrogatories – 17. Provide documentation of all ten officials communicated by E.A. Rico Williams that blocked the Plaintiff in the South Carolina High School league / SCBOA District One.
Response: Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order. The information provided is not authentic, created by the Law Firm Sowell SG Gray along with cited dates of blocks. The Defendant Rico Williams created a list with hand

written dates. The Plaintiff challenges the authenticity of all documents and declares that they a not admissible along with the protection order granted to the Defendants.

SOWELL GRAY

December 16, 2016

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

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
Date of Loss: 2/2/16
IRF Claim No.: 74430
Our File No.: 5346/1536

Dear Ms. Richburg:

I hope you are doing well, and I look forward to seeing you at your deposition on Wednesday, December 21st. I am enclosing a copy of the Protective Order that Judge Verdin entered in this case, as well as a copy of her Order denying your Motion to Dissolve, Terminate, or Cancel Defendant's Motion For a Protective Order. You may have already received them from the Court, but I am sending to you out of an abundance of caution.

Pursuant to the Protective Order that prevents disclosure of this information outside of this lawsuit, enclosed please find a list of officials and schools that have blocked you as of December 16, 2016 (Dates labeled 10-11). Additionally, the dates that the officials' blocks were entered are as follows:

1. [redacted] October 8, 2016
2. [redacted] August 3, 2016
3. [redacted] July 24, 2016
4. [redacted] November 4, 2015
5. [redacted] July 30, 2016
6. [redacted] July 12, 2016
7. [redacted] August 11, 2016
8. [redacted] January 2, 2016
9. [redacted] August 1, 2016
10. [redacted] July 13, 2016

I'd also like to explain that these names would not necessarily be the ones referenced in Mr. Williams' email of February 5, 2016, as these names have only been entered in the Arbiter system

used to schedule varsity contests. It is my understanding that the ten officials' blocks referenced by Mr. Williams in his email would have come from the Arbiter system used for sub-varsity contests. If any of the officials on Mr. Williams' list are the same as the officials on the SCHSL list, it would be because that official works both varsity and sub-varsity contests and has blocked you for both. Again, there is a different set of partner blocks for varsity contests and for sub-varsity contests. The list provided above would only apply to varsity contests.

With respect to the school blocks, the SCHSL enters blocks for the high school in the attendance area in which the official lives, along with the high school the official attended. Based on your application back in 2013, these blocks for Mauldin High School and Southside High School for varsity basketball contests were entered by Wynne Dee Cockfield at the SCHSL office. Again, this would only apply to varsity contests being assigned by Arbiter, and this information would not necessarily be accessible by Mr. Williams.

Please let me know if you have any additional questions or concerns. With warmest regards, I remain

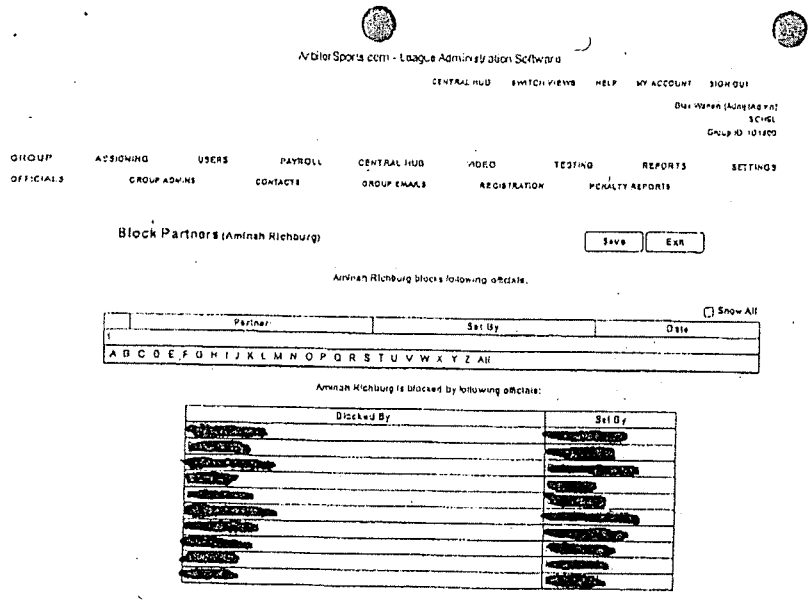
Very truly yours,

J. Michael Montgomery

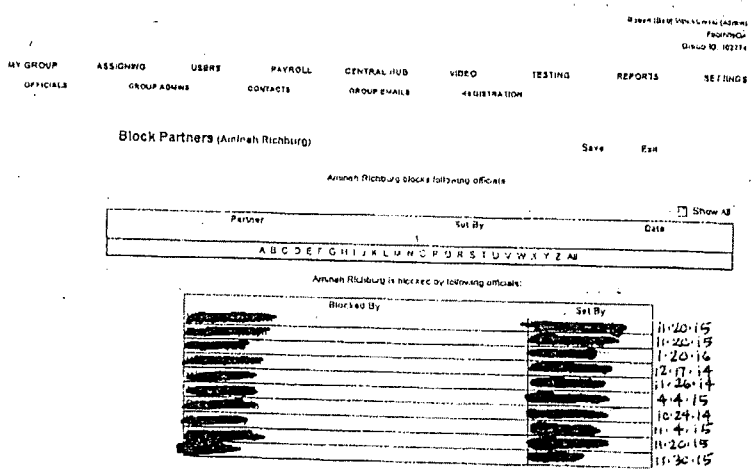
JMM:smm

Enclosures

cc: Sarah Day Hurley, Esquire



The Defendant E.A. Rico Williams sent his list after the Plaintiff filed Memorandum In Support of Motion to Dismiss Protective Order, Reversal of Court Protection Order. The ten names provided by the Defendant, the Plaintiff has gleaned the confidential information and pleads with the Court to support her objection to the false information provided and would ask the court to question the validity and reliability of the alleged true information communicated by E.A. Williams in the affidavit. According to the information provided by E.A. Rico Williams, the officials presented by the Defendant E.A. Williams are objectionable and the Plaintiff alleges that they were recently created by the Defendant along with hand written blocked dates with the Plaintiff.



SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL- SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
OFFICIAL 1	NONE		
OFFICIAL 2	NONE		
OFFICIAL 3	(2) 12/11/14 , 1/30/15		11/20/15
OFFICIAL 4	NONE		
OFFICIAL 5	NONE		
OFFICIAL 6	NONE		
OFFICIAL 7	2/2/15		4/4/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (WILLIAMS 00038)	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) –DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES/ EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE) PRESENTED BY DEFENDANT – E.A. RICO WILLIAMS
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 Game Scheduled no Block

The Statements Made by Rico Williams in the February 5, 2016 Email communicating the Plaintiff's attendance to meetings were not true. The evidence presented by Rico Williams and the South Carolina High School League have been created by the Defendants none of the documents presented are authentic and furthermore the documents have been manipulated fictitiously to support the continuous defamation of the Plaintiff. Any statements in Affidavits communicated by Defendants Rico Williams and the South Carolina High School League must not be honored.

The Plaintiff attended the required four meetings for the 2015-2016 Basketball Season and met all requirements according to the SCBOA District One Contract and Code of Ethics supported by the assignment of games she received during the 2015-2016 Basketball Season. All statements made by the Defendant are not true. The Plaintiff has requested discovery for all sign in sheets that document the arrival times for all SCBOA District One Officials for all meetings and South Carolina High School League meetings for the past five years. The Plaintiff's repeated Motion to Compel have not been supported by the court or the Defendants, the Plaintiff has yet to receive any documentation. The Defendants presented a recent created table with selected names indicating meeting attendance along with arrival and departure times. The document presented is not authentic evidence and any presented information cannot be trusted or verified.

Name	31-Aug-15	14-Sep-15	21-Sep-15	28-Sep-15	5-Oct-15	12-Oct-15	19-Oct-15	26-Oct-15	2-Nov-15	9-Nov-15	11-Jan-15
Double / Single						Mechanic's MTG					Mid-Season Mtg
Crotts, Michael	****			****				****		****	
Edwards, Mack			****			****	****	****	****	****	****
Elmer, Joe	****	****		****	****	****		****	****	****	****
Greer, Gordon	****		****			****			****		
Richburg, Aminah	****		****				****		****		
Wnukowski, Bob	****					****	****	****			

Copied from the Attendance spreadsheet for SCBOA District #1 for 2015/2016 season.

Each Official is marked as in attendance with the **** mark for the dates detailed. Blank Cell Indicates Absent for that date.

The cells identified with the Red Triangles in the upper right corner have comments attached to the cell as detailed below:

- Joe Elmer: 21 Sept-SCHSL Volleyball Match Assignment
- Gordon Greer: 31 Aug–Left Early @ 7:00 Personal; 21 Sept-Left Early @ 7:45 Personal; 19 Oct- SCHSL Volleyball Match Assignment
- Aminah Richburg: 21 Sept- Arrived Late to Mtg @ 7:35; 19 Oct- Arrived Late to Mtg @ 7:05
- Bob Wnukowski: 12 Oct- Left Early @ 7:10 Personal

Kevin N. Brown SCBOA District #1 Secretary/Treasurer

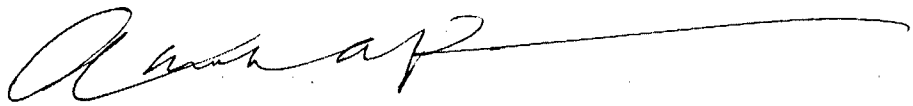
The Defendants have not provided the documentation requested by the Plaintiff for the First and Second Interrogatories. The Plaintiff did not receive any correspondence from the defendants prior to March 20, 2017. All discovery information will bear witness to the defamatory behavior of the Defendants towards the Plaintiff and support the complaint communicated by the Plaintiff.

Conclusion

For the reasons set forth above, the Plaintiff moves that the entry for summary judgment be dismissed and not honored.

Respectfully submitted,

Aminah A. Richburg Pro Se / Plaintiff



217 Plum Creek Lane

Greenville, SC 29607

864-419-6707

arichbur@greenville.k12.sc.us

Greenville, South Carolina

April 24, 2017

STATE OF SOUTH CAROLINA)
) IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE) Docket No. : 2016-CP-23-02113
AMINAH A. RICHBURG)
Plaintiff)

vs.)

E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE)

Defendants)

MEMORANDUM IN SUPPORT TO DISMISS THE MOTION FOR SUMMARY JUDGMENT BY DEFENDANT E.A. "RICO" WILLIAMS

FILED-CLERK OF COURT
PAUL B. WICKENSHER
GREENVILLE CO. SC
2017 APR 24 PM 4:57

SCANNED

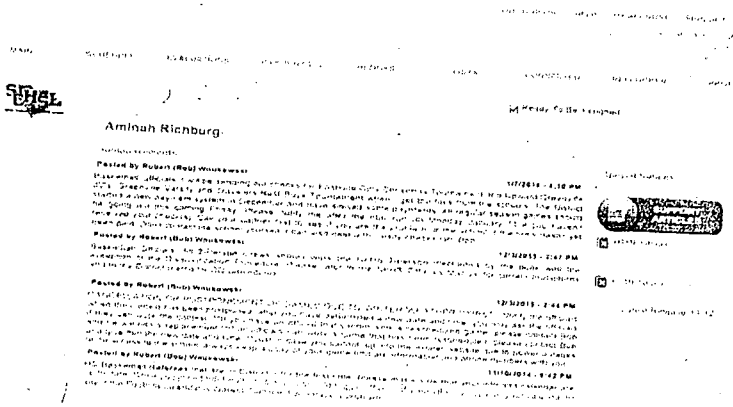
Plaintiff Aminah A. Richburg submits this Memorandum in Support to Dismiss the Motion for Summary Judgment by Defendant E.A. Rico Williams. A hearing was held on March 20, 2017 at 3:00 p.m.

Plaintiff Response

Defendant Rico Williams became the District One Director for the South Carolina Basketball Officials Association in 2015-2016 replacing Jenny Norris who served as the Director for five years or more prior to the election of Defendant Rico Williams. The SCBOA is not a separate organization as communicated by the Defendant its jurisdictions falls under the South Carolina High School League. The South Carolina High School League only allows site management for the numerous districts in the state of South Carolina.

ArbiterSports.com - League Administration Software

Page 1 of 1



ENTERED COMPUTER

The Defendant Mr. Rico Williams has been a member of the South Carolina High School League for twenty years or more and created a fictitious narrative when he communicated that ten or more officials approached him during the 2015-2016 Basketball season to communicate that the Plaintiff Aminah A. Richburg communicated her unwillingness to accept constructive criticism, advice, instruction or any information given by them that she may deem unnecessary. During the 2015-2016 Basketball season ten officials did not approach the Defendant Rico Williams as District One Director communicated in the Defamatory Email. "From our records communicated by Rico Williams you were marked off by two schools and ten officials and literally every one of them are higher rated either sub-varsity, or varsity level who still work JV games". The two schools mentioned by the Defendant E.A. Rico Williams were also untrue based on how they were unitized in his communication to blight the Plaintiff. The hearsay statements about the Plaintiff's attire are not valid as well, there is no reporting system or evaluation on attire as communicated by the Defendant Rico Williams.

The Defendant communicated that he has been a member of the SCBOA for twenty or more years yet, The Defendants Answers to Plaintiff's First Set of Continuing Interrogatories – 17. Provide documentation of all ten officials communicated by E.A. Rico Williams that blocked the Plaintiff in the South Carolina High School league / SCBOA District One.
Response: Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order. The information provided is not authentic, created by the Law Firm Sowell SG Gray along with cited dates of blocks. The Defendant Rico Williams created a list with hand written dates. The Plaintiff challenges the authenticity of all documents and declares that they a not admissible along with the protection order granted to the Defendants.

SOWELL GRAY

December 16, 2016

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

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
Date of Loss: 2/3/16
IRF Claim No.: 74430
Our File No.: 5346/1536

Dear Ms. Richburg:

I hope you are doing well, and I look forward to seeing you at your deposition on Wednesday, December 21st. I am enclosing a copy of the Protective Order that Judge Verdin entered in this case, as well as a copy of her Order denying your Motion to Dissolve, Terminate, or Cancel Defendant's Motion For a Protective Order. You may have already received them from the Court, but I am sending to you out of an abundance of caution.

Pursuant to the Protective Order that prevents disclosure of the information outside of this lawsuit, enclosed please find a list of officials and schools that have blocked you as of December 16, 2016 (Bates labeled 10-11). Additionally, the dates that the officials' blocks were entered are as follows:

1. [redacted] October 8, 2016
2. [redacted] August 9, 2016
3. [redacted] July 24, 2016
4. [redacted] November 4, 2015
5. [redacted] July 30, 2015
6. [redacted] July 12, 2016
7. [redacted] August 11, 2016
8. [redacted] January 2, 2016
9. [redacted] August 1, 2016
10. [redacted] July 13, 2016

We also like to explain that these names would not necessarily be the ones referenced in Mr. Williams' email of February 5, 2016 as these names have only been entered in the AREMS system

used to schedule varsity contests. It is my understanding that the ten officials' blocks referenced by Mr. Williams in his email would have come from the Arbiter system used for sub-varsity contests. If any of the officials on Mr. Williams' list are the same as the officials on the SCHSL list, it would be because that official works both varsity and sub-varsity contests and has blocked you for both. Again, there is a different set of partner blocks for varsity contests and for sub-varsity contests. The list provided above would only apply to varsity contests.

With respect to the school blocks, the SCHSL enters blocks for the high school in the attendance area in which the official lives, along with the high school the official attended. Based on your application back in 2013, these blocks for Mauldin High School and Southside High School for varsity basketball contests were entered by Wynne Dee Cockfield at the SCHSL office. Again, this would only apply to varsity contests being assigned by Arbiter, and this information would not necessarily be accessible by Mr. Williams.

Please let me know if you have any additional questions or concerns. With warmest regards, I remain

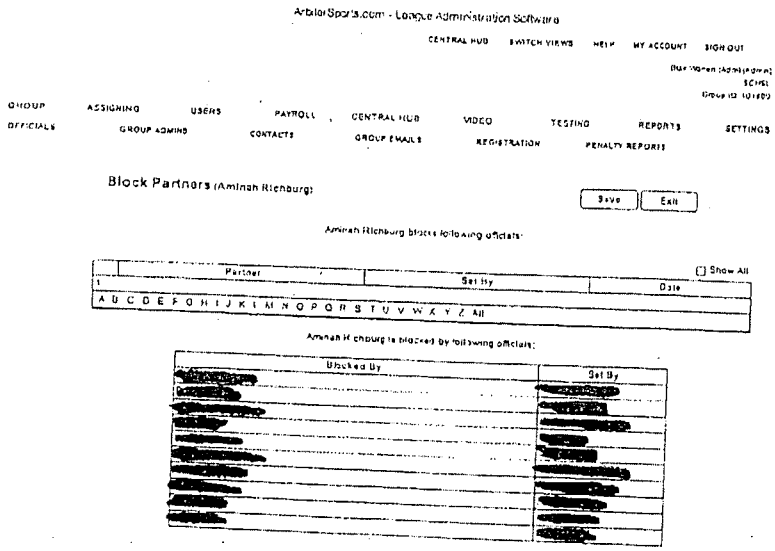
Very truly yours,

J. Michael Montgomery

JMM:cnm

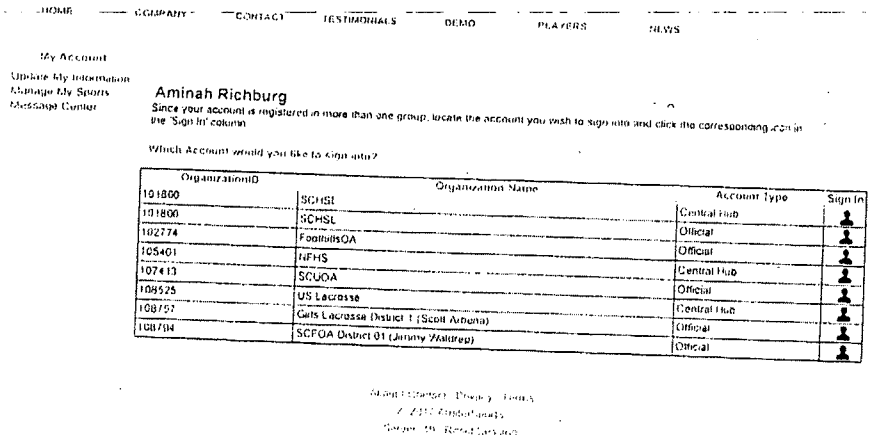
Enclosures

cc: Sarah Day Hurley, Esquire



TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (WILLIAMS 00038)	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) –DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES/ EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE) PRESENTED BY DEFENDANT – E.A. RICO WILLIAMS
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 Game Scheduled no Block

The Plaintiff is a member of the following South Carolina District One Officiating Organizations affiliated with the South Carolina High School League. Each organization is site managed and has its own director. The organizations are not affiliated with SCBOA as communicated above by the Defendants.


HOME COMPANY CONTACT TESTIMONIALS DEMO PLAYERS NEWS

My Account
Update My Information
Manage My Sports
Message Center

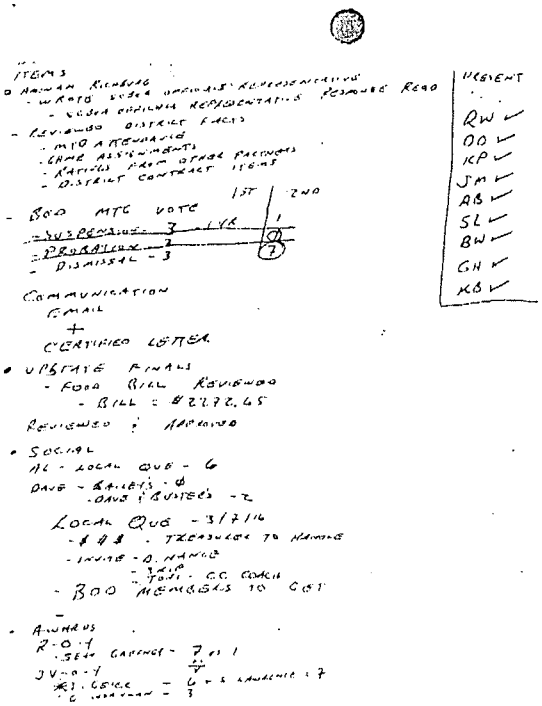
Aminah Richburg

Since your account is registered in more than one group, locate the account you wish to sign into and click the corresponding icon in the 'Sign In' column

Which Account would you like to sign into?

OrganizationID	Organization Name	Account Type	Sign In
101800	SCHSL	Central Hub	
101800	SCHSL	Official	
102774	FootballSOA	Official	
105401	NFHS	Official	
107413	SCUOA	Central Hub	
108525	US Lacrosse	Official	
108757	Girls Lacrosse District 1 (Scott Arbona)	Central Hub	
108794	SCFOA District 01 (Jimmy Waldrep)	Official	
		Official	

The Plaintiff challenges the authenticity of the document presented that the Defendant Rico Williams presented to support the Plaintiff's termination from SCBOA. It has been altered and the vote does not reflect what was communicated by Defendant Rico Williams.



Plaintiff Response

The Plaintiff has addressed the defamatory email sent by the Defendant Rico Williams sent to SCHSL Leaders and members of the SCBOA Board to terminate the membership of the Plaintiff Aminah A. Richburg. The Defendant purposefully created a false narrative to influence and direct the behavior of all individuals and ultimately through abuse of his position as District One Director masterminded the termination of the Plaintiff. The communication was not made in good faith. The subject matter was between the Plaintiff and the Defendant Rico Willliams through which the Plaintiff had a right as a human being to communicate her dismay with the behavior of the Defendant Rico Williams. The Defendant Rico Williams behavior was not in good faith and the interest of the SCBOA District One was not an interest to be upheld or occasion to support the sharing of the communication. The Plaintiff did nothing to cause detriment to the organization, the purpose of the email communication sent by the Defendant Rico Williams was only defamatory in nature. During the previous telephone conversation between the Plaintiff and the Defendant Rico Williams, the Defendant did not communicate a need to use his authority to enforce professional standards or suggest that the Plaintiff remittance to the SCBOA District One would be reviewed with the contingency for the Plaintiff to transfer to another basketball district.

The Defendant sent the email only to communicate to other Board Members that violate the SCBOA District One Contract – Line 24 – I agree that I will not use the District One Membership for solicitation purposes, that we need to terminate the membership of the Plaintiff because she is challenging the behavior and influence of the current District One Director Rico Williams. For the past three years, many members of the SCBOA District One Board have officiated games assigned by Rico Williams not affiliated with the South Carolina High School League with the Plaintiff. The

Plaintiff has requested this documentation and written several motions to compel for this information, the Defendants have not provided this information. Again, the Plaintiff has a right as a human being to communicate her dismay with Defendant Rico Williams. The remarks made by the Plaintiff were professional and her conduct at all times when representing the SCBOA District One/South Carolina High School League are professional as well. The behavior of the Plaintiff did not warrant the unprofessional defamatory disciplinary actions taken by the Defendant Rico Williams against the Plaintiff. The Defendant Rico Williams exerted his positional power when he stated you will not be considered for any future assignments until your status as a District One member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning professionalism, declining standards, etc, it is obvious that you feel your membership is not being served adequately by the present leadership. I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facility the communication to any District in South Carolina that you choose if that is the route that you deem favorable. The Defendant Rico Williams statements were communicated with malice and disdain along with an exertion of positional power. The conversation nor the communications between the Defendant Rico Williams and the Plaintiff required and disciplinary action because initially it wasn't a disciplinary issue when the first conversation took place between the Defendant Rico Williams and the Plaintiff. The Defendant Rico Williams did not extend an "olive branch" previously described by his legal counsel through his communications and the statements were not made in good faith. All actions performed by all Defendants, Rico Williams and leadership at the high school league were defamatory in nature and it continuously brings a multitude of pain and suffering to the Plaintiff. The Defendants continuous refusal to cooperate in the discovery process by supplying all information communicated in the First and Second Interrogatories supports their heresy when communicating the Plaintiff's lack of evidence.

The Plaintiff contacted Skip Lax due to information provided on the South Carolina High School League website for basketball officials. The Defendant Skip Lax's lack of participation contradicts his responsibilities stated in the by-laws and constitution for South Carolina Basketball Officials. The Defendant conspired with Rico Williams and contributed to the defamation of the Plaintiff.

SOUTH CAROLINA BASKETBALL OFFICIALS ASSOCIATION
2015 - 2016

OFFICERS

PRESIDENT ..... SIDNEY GRAY
VICE PRESIDENT ..... MARC TINDAL
SECRETARY ..... PAUL BEHR
PAST PRESIDENT ..... SHELDON BOLDS
OFFICIALS REPRESENTATIVE ..... JOEDY MOOTS
COMMISSIONER ..... SKIP LAX

DIRECTORS

DISTRICT 1
Rico Williams
1 Ridgeside Ct
Greenville, SC 29617
(C) 864-430-9884
(H) 864-294-0857
Ricowms@charter.net

DISTRICT 2
Jerome Hall
145 Westmeath Drive
Moore, SC 29369
(H) 864-595-1809
(C) 864-590-4731
jhall805@bellsouth.net

DISTRICT 3
Paul Behr
1080 Saddle Drive
York, SC 29745
(H) 803-628-4279
(C) 803-517-3884
pbehr@districtshoops.com

DISTRICT 4
Gene Simmons
P.O. Box 402
Clinton, SC 29325
(H) 864-833-3688
(W) 864-833-1555
(C) 8642005907
gsimmons@presbyterian.edu

DISTRICT 5
Richie Jeffcoat
341 Fallen Timber Trail
Blythewood, SC 29016
803-333-4288 (W)
803-727-3921 (C)
803-834-4112 (H)
rjeffcoat@sc.rr.com

DISTRICT 6
Sheldon Bolds
73 Kendall Drive
Dillon, SC 29910
843-757-8779 (H)
843-200-7871 (C)
bolds44@sharpnet.com

DISTRICT 7
Leon Myers
PO Box 7431 SCSU
Orangeburg, SC 29117
(H) 803-536-5575
(W) 803-536-8884
(C) 803-378-3113
myers7@scsu.edu

DISTRICT 8
Marc Tindal
PO Box 1307
Manning, SC 29102
(C) 843-992-5088

(H) 843-479-5358
marctindal@yahoo.com

DISTRICT 9
Granderson Jones
P O Box 3015
Sumter, SC 29151

(C) 803-968-2391
gmoderny@aol.com

DISTRICT 10
Rasco Campbell
108 Kennedy Lane
Piedmont, SC 29673
(H) 864-220-0633
(W) 864-403-2100
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rcampbell@piedmont.k12.sc.us

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Jake Novak
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Sidney Gray
433 Jamestown Drive
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COMMISSIONER
Skip Lax
PO Box 211575
Columbia, SC 29221
(H) 803-359-7121
(W) 803-798-0120
slax@scsd.us

OFFICIALS REPRESENTATIVE
Joedy Moots
141 Switch Grass Dr
Lugoville, SC 29070
(H) 803-896-3527
(C) 803-521-0720
joedy52@gmail.com

Article X DISCIPLINE OF OFFICIALS

Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors.

RESPONSIBILITIES OF THE OFFICIALS

Officials should:

- Maintain a neat appearance, and be friendly but businesslike.
- Know fully the rules and accepted officiating procedures.
- Make decisions promptly, fairly, and without arrogance.
- Be consistent.
- Eliminate showboating in officiating.
- Be on time and start the game on time.
- Refrain from placing hands on players during an athletic contest.
- Work together with other officials. A pre-game conference prior to each game is a must.

DISCIPLINE OF OFFICIALS

Officials associations may set up rules and regulations for the discipline of its members. The legislative assembly of the South Carolina High School League is of the opinion that the final authority of discipline for both schoolmen and athletic game officials must be centralized and that this centralized authority will be the Executive Director of the league. The Executive Director has the authority to discipline the official in one or more of the following manners:

Warning - this is an official notice that an inexcusable, unethical or unsportsmanlike action is a matter of record and must not happen again.

Probation - this is a more severe type of warning. An official on probation may be assigned to regularly scheduled games but he will not be assigned to a play-off game for a conference championship, a play-off game toward the state championship or a tournament of any type.

Suspension - a suspended official may not work an interscholastic athletic contest of any kind for a member of the South Carolina High School League or a school that is a member of another

state associated with the National Federation of State High School Athletic Associations.

Fine - a fine may be levied separately or in addition to a warning, probation or suspension. It will be levied against the official and may range from the fee received for working the game up to a maximum of $100.00. Any disciplinary action by SCBOA or the Executive Director may be appealed to the Executive Committee of the High School League.

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "skip@schsl.org" <skip@schsl.org>
Tue, Feb 9, 2016 at 4:43 PM

Mr. Lax, I am forwarding this email message sent by Rico Williams which I believe is highly inappropriate for a District One Director. Mr. Williams did not initiate the call because of a High School League Game, he called to confirm games assigned at Furman University through his business.I confirmed the assigned games through a text message initiated by Mr. Williams the previous week. When I returned Mr. Williams phone call, he stated that the games were still on and I responded ok about the games, then Mr. Williams communicated that someone at my previous game told him I had on sweat pants, then he asked if I wore sweat pants and I told him, "I do not wear sweat pants, is that all? Then Mr. Williams asked the question, if I had a problem discussing my sweat pants and I repeated, " I do not wear sweat pants, is that all, because I am at work and I need to get off the phone. Mr. Williams responded fine and the conversation ended. Unfortunately the details of our conversation changed with Mr. Williams interpretation in the email he sent to you and several others. I communicated my concerns with a text message to Mr. Williams later because he harassed me and I was obligated to let him know. I now feel that I am being harassed, embarrassed and bullied by Mr. Williams and the email communication he has sent to various individuals proves his lack of professionalism. My meeting attendance has never been a problem with prior leadership or with the current leadership until now. It is true that I attended three meetings this year, I planned to make the fourth meeting, unfortunately, Mr. Williams changed the meeting date and I had a conflict. I met all requirements to officiate basketball games for the SCHL by attending all required meetings. Mr. Williams has shared a lot a damaging information that I did not know concerning my colleagues that have communicated that they did not want to work with me and blocked schools. I know that I blocked CCES and Hillcrest Middle School myself due to personal reasons. If there were any schools that blocked my assignment other than the schools I blocked, I was scheduled that the same schools this year along with some of the same officials. I would like to know the officials that blocked me, it would help me in the future if those same officials officiate other sports. Mr. Williams has his circle of supporters that he has put in leadership positions and many of those individuals character are similar to his. I am an educated professional and sometimes my demeanor may clash with individuals whose behavior is unprofessional and uncouth. Mr. Williams has no legitimate reason to discuss or set parameters towards my participation with the SCHL or District One Board with my continued participation as a basketball official. Furthermore, I would like Mr. Williams to present a detailed list of arrival times for all District One officials for all meetings.I have done nothing out of character. I would like a written apology from Mr. Williams for his lack of professionalism and the pain and suffering he has caused me.

Aminah A. Richburg

Skip Lax <skip@schsl.org>
To: aminah richburg <richburga@bellsouth.net>
Wed, Feb 10, 2016 at 9:45 AM

Aminah, We do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level.- Sincerely,Skip

From: "aminah richburg" <richburga@bellsouth.net>
To: skip@schsl.org
Sent: Tuesday, February 9, 2016 4:43:15 PM
Subject: Fw: Information for Official
[Quoted text hidden]

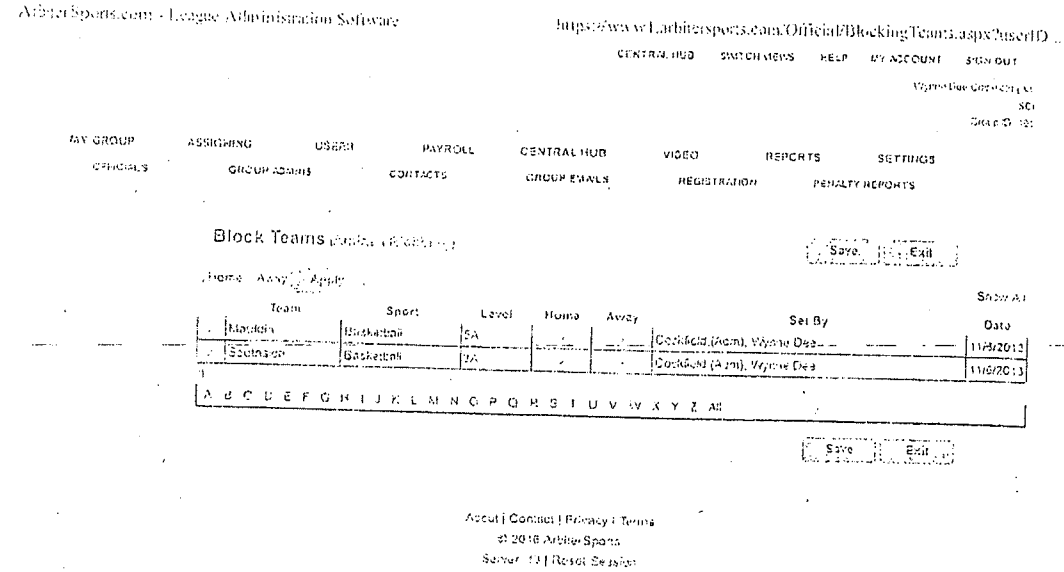
aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Skip Lax <skip@schsl.org>
Thu, Feb 11, 2016 at 1:36 PM

I do not believe my concerns are a district matter and I will hire an attorney to seek relief for my pain and suffering on this matter and communicate the lack of support I am receiving from leadership at the SCHL..
Aminah Richburg
[Quoted text hidden]

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "jmoots@grayca.com" <jmoots@grayca.com>
Tue, Feb 16, 2016 at 10:49 AM

You are listed as the Officials Representative please advise on this matter.
Aminah A. Richburg
richburga@bellsouth.net

The Plaintiff did varsity basketball scrimmages assigned through SCBOA District One during the summer for two days, basketball scrimmages during the fall before the season, and attended four meetings, three at the district level and one required by the South Carolina High School League. The Plaintiff took the required online test through the National High School League site for basketball officials, traveled to Columbia, South Carolina to take the state required test and met all requirements to officiate basketball in the state of South Carolina for the 2015-2016 Basketball Season by receiving assignments for basketball games at the middle and high school level. The Plaintiff graduated from Southside High School in Greenville County in 1985, South Carolina State University in 1990, Clemson University 1998, Master's Degree in Education Administration and 2004 South Carolina State University, Doctorate in Education Administration. The Plaintiff lives near Mauldin High School.



The Plaintiff contacted the Defendant Mr. Joedy Moots and his lack of intervention led to the defamation of the Plaintiff. The response from the Defendant clearly reflects the interpretation of the false narrative communicated by the Defendant Rico Williams. The Defendant Mr. Joedy Moots acted unprofessionally when he shared some but not all of his communications with the Defendant Rico Williams which were discussed at the Board Meeting, indicated in writing. The communication was utilized to defame the Plaintiff. Mr. Moots communicated that he would love to talk to the Plaintiff but failed to represent her according to his position.

Aminah Richburg

Inbox x
richburga@bellsouth.net x
richburga@bellsouth.net/Sent x

aminah richburg <richburga@bellsouth.net> 2/17/16

to jmoots

Joedy Moots, I forwarded and email that describes a dilemma I am experiencing right now as a basketball official. Please respond and let me know you are aware of my circumstances and what is my position or rights in this matter with Rico Williams, District 1.

Joedy Moots <jmoots@grayca.com> 2/17/16

to aminah

I received your email. I have been in district meetings the past two day. I will review what you sent and get back with you by tomorrow.

aminah richburg <richburga@bellsouth.net> 2/17/16

to Joedy

Thank you

Joedy Moots <jmoots@grayca.com> 2/22/16

to aminah

Ms Richburg,

I have read the corresponding email from your Director, Rico Williams. I have also reviewed your text to Mr. Williams as well. I have always had respect for our states district directors and the high school league office. Being the officials representative the past four years has been very rewarding to me, but has opened my eyes with even more respect and admiration for both the league and directors. In my real line of work, I am a high school principal and have been in administration for over 20 years. In a way, that is what a director is. The officials in their district are their staff and they are responsible for them. Always dress professional with a clean uniform because you are not only representing yourself, but your district and state as well. I am going to say some things that you are probably not going to like, but if you ask anyone about me, I will always be brutally honest.

As far as Mr. Williams, he is one of the most respected officials and directors in the state. I have never known him as being anything but sincere, honest and professional. I have had disagreements with him myself, but in all my dealings with him, he was professional and respectful. In reading the correspondence from him to you, I feel all his responses were merited. It seems

you are having trouble with fellow officials and other schools. It looks to me that Mr. Williams has gone the extra mile to help you advance in your officiating career.

As an administrator, if one of my employees talked about me like you did about Mr. Williams, they would be put on leave for insubordination. I have never seen you work so I cannot comment on your officiating ability but I do want to give you some advice. None of us are in this for the money, we are in it for the love of sport and the love of kids. The game is bigger than us and once we are gone, the game will go on. Get along with your peers and administrators. Be an official that everyone wants to work with and have you on their games. There will always be officials and coaches you don't necessarily like, but they should never know it.

I also agree with Mr. Williams that if you are still serious about officiating, you should try another district, especially after your accusations about your director. Be careful not to burn many bridges in your journey through officiating and life, you never know when you will need to cross one to advance or continue growing.

Best of luck in all you do!

Joedy

minah richburg <richburga@bellsouth.net> 2/23/16

to Joedy

Mr. Moots, I am disappointed with your response and I believe that you response is prejudiced on Mr. Williams behalf. I have not communicated with anyone except Mr. Williams. It was Rico Williams that sent all written communications, I merely forwarded the communications to you. I have a right as a human being to communicate to anyone when I have been harassed. Mr. Williams asked if I wore sweat pants and I communicated to him that I do not wear or own sweat pants is that all. I am always dressed professionally and clean according to the SCHL officials dress code requirement. Unfortunately, Mr. Williams has contracted numerous recreation organizations that require sports officials in the Greenville area where I reside and his position I felt was a conflict of interest with his position with the South Carolina High School League whereas he is able to control officiating opportunities and further use his position of power. I have not had any problems with any officials when I have been assigned games and I have not had any problems at any schools. My assignments have not changed at all and I have officiated games at the same schools for the past three years. The only blocks that I am aware of are blocks I have created in the system. Mr. Williams is not attempting to help me at all, in fact his behavior and communications have been destructive. If there was a problem, it was never communicated and as I stated before, my assignments have not changed in the past three years. I have officiated games in the same schools with the same officials every year. Changing officiating districts will create a personal burden for me. I am a professional and I get along with all officials I work with and administrators. Again Mr. Moots, I am disappointed with your response which is personal and biased on behalf of Mr. Williams. I am quite sure that if you take time and review all of the documentation presented on my behalf as my Officials Representative and also take time to review my assigned games for the past three years, you will see that Mr. Williams responded unprofessionally towards me as the District One Director. Your accusable statement to insubordination on my part is unfounded and unmerited. I only sent one text message to Rico Williams communicating my response to his previous cellular phone call, which I have a right to do as a human being. Mr. Williams began the conversation with communicating with me that I will be assigned to officiate games at Furman University and I responded that I sent him a text earlier acknowledging the assignment then Rico Williams stated that someone told him that I had on sweat pants for a previously assigned game with the SCHL. I told Mr. Williams that I do not wear or own sweat pants is that all. My statement was not disrespectful and my text only communicated my position on how Mr. Williams began the conversation by discussing his personal officials assigning

business and followed up with disrespect and harassment by asking me if I wore sweat pants to a previous SCHL game. It is evident that I have done nothing wrong and my officiating skills, officiating dress and level of professionalism were not a problem until I communicated my disdain to Rico Williams. At this point, I only sought unbiased representation from my Officials Representative, unfortunately the officials representative responded like a District Director's representative. Please communicate my position as a District One Basketball Official for District One for 2016-2017, Mr. Williams stated that I was not in compliance for some reason after my recent text communication, I did not receive any communication before the 2015-2016 Basketball Season began that I was not in compliance. Mr. Moots, I want you to know that I am a professional at all times all communications are considered business on my behalf nothing is personal.

Joedy Moots <jmoots@grayca.com> 2/23/16

to aminah

Aminah,

You are correct, I only went on what was said in the emails and text. I didn't mean you were insubordinate but that if one of my staff talked to me like that, I would consider it insubordination. Believe me, the basketball directors and I have gotten into many disagreements because I am always taking up for my officials. But you can't win am argument with your director because they have too much power within the organization. You have to find a way to get along. Like I said, I have no knowledge of your officiating ability. I can definitely see there is a personality conflict and the best thing you can do is go to a different district. If I were you, in a respectful way, I woukd ask him to elaborate on his accusations about schools and officials marking you off. You seem like an extremely intelligent young lady and I hope you stick with officiating because we need more females in sports..I really cant help you with Rico. But if there is anything I can do for you, I would gladly help. I am hoping I get assigned the upper state finals this weekend. If I do, I will be at all games. I will be in the officials suite. I woukd love to sit down and talk to you.

aminah richburg <richburga@bellsouth.net> 2/24/16

to Joedy

I appreciate your honesty, I will not seek officiating opportunities in a different district because I work and live in the Greenville area and the distance required to officiate in nearby counties will be burdensome. I will pay my registration for District One as I have for the past three years. Rico is an ignorant man and he displayed his lack of professionalism and leadership ability as the District One Director.

Plaintiff Response

Rule 56 of the South Carolina Rules of Civil Procedure that allows the Court to enter summary judgment is not applicable for the Defendant Rico Williams and the SCHSL, the Plaintiff has provided a genuine issue of material fact. The issues presented by the Plaintiff exist and they are triable. The Plaintiff continues to appeal to the court to view all evidence presented by the Plaintiff and compel the Defendants to present all information requested by the Plaintiff. The lack of cooperation from the Defendant's Rico Williams and the South Carolina High School League in

providing all discovery information requested by the Plaintiff has detrimentally curtailed supportive facts to be presented for trial.

The Plaintiff's Complaint is justified and must not be dismissed because (1) the statements made by Mr. Williams in the February 5, 2016 email were not true, and (2) the statements made by Mr. Williams in the February email were not subject to a qualified privilege.

The Statements Made by Rico Williams in the February 5, 2016 Email communicating the Plaintiff's attendance to meetings were not true. The evidence presented by Rico Williams and the South Carolina High School League have been created by the Defendants none of the documents presented are authentic and furthermore the documents have been manipulated fictitiously to support the continuous defamation of the Plaintiff. Any statements in Affidavits communicated by Defendants Rico Williams and the South Carolina High School League must not be honored.

The Plaintiff attended the required four meetings for the 2015-2016 Basketball Season and met all requirements according to the SCBOA District One Contract and Code of Ethics supported by the assignment of games she received during the 2015-2016 Basketball Season. All statements made by the Defendant are not true. The Plaintiff has requested discovery for all sign in sheets that document the arrival times for all SCBOA District One Officials for all meetings and South Carolina High School League meetings for the past five years. The Plaintiff's repeated Motion to Compel have not been supported by the court or the Defendants, the Plaintiff has yet to receive any documentation. The Defendants presented a recent created table with selected names indicating meeting attendance along with arrival and departure times. The document presented is not authentic evidence and any presented information cannot be trusted or verified.

Name	31-Aug-15	14-Sep-15	21-Sep-15	28-Sep-15	5-Oct-15	12-Oct-15	19-Oct-15	26-Oct-15	2-Nov-15	9-Nov-15	11-Jan-15
Double / Single						Mechanic's MTG					Mid-Season Mtg
Crotts, Michael	****			****				****		****	
Edwards, Mack			****			****	****	****	****	****	****
Elmer, Joe	****	****		****	****	****		****	****	****	****
Greer, Gordon	****		****			****			****		
Richburg, Aminah	****		****				****		****		
Wnukowski, Bob	****					****	****	****			

Copied from the Attendance spreadsheet for SCBOA District #1 for 2015/2016 season.

Each Official is marked as in attendance with the **** mark for the dates detailed. Blank Cell indicates Absent for that date.

The cells identified with the Red Triangles in the upper right corner have comments attached to the cell as detailed below:

- Joe Elmer: 21 Sept-SCHSL Volleyball Match Assignment
- Gordon Greer: 31 Aug–Left Early @ 7:00 Personal; 21 Sept-Left Early @ 7:45 Personal; 19 Oct- SCHSL Volleyball Match Assignment
- Aminah Richburg: 21 Sept- Arrived Late to Mtg @ 7:35; 19 Oct- Arrived Late to Mtg @ 7:05
- Bob Wnukowski: 12 Oct- Left Early @ 7:10 Personal

Kevin N. Brown SCBOA District #1 Secretary/Treasurer

WILLIAMS 000124

Clearly, the Defendant Rico Williams email was not made in a proper manner to proper parties only, and therefore is not subject to a qualified privilege.

Conclusion

For the reasons set forth above, the Plaintiff moves that the entry for summary judgment be dismissed and not honored.

Respectfully submitted,

Aminah A. Richburg Pro Se / Plaintiff

217 Plum Creek Lane

Greenville, SC 29607

864-419-6707

arichbur@greenville.k12.sc.us

Greenville, South Carolina

April 24, 2017

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE AMINAH A. RICHBURG Plaintiff vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE Defendants	IN THE COURT OF COMMON PLEAS Civil Action No. 2016-CP-23-02113 BRIEF IN UPHOLDING THE PLAINTIFF'S MOTION TO COMPEL AND OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGEMENT

SCANNED

FILED-CLERK OF COURT
PAUL B. WICKENSIMER
GREENVILLE CO. SC
2017 APR 24 PM 4:59

The Plaintiff Aminah A. Richburg hereby submits in this brief in upholding the Plaintiff's motion to compel and opposition to Defendant's motion for Summary Judgment which was heard on Monday, March 20, 2017 at 3:00 p.m.

The Defendants have failed to produce documents and failed to cooperate in the discovery process. The South Carolina High School League attorney Michael Montgomery has responded to the 1st and 2nd Interrogatories. Sarah Hurley attorney for E.A. Rico Williams has only responded to the 1st set of Interrogatories and disregarded the 2nd Set of Interrogatories by failing to respond.

The Plaintiff filed the lawsuit on March 31, 2016. In the complaint against the Defendants the Plaintiff alleged the Defendants individually and through their officers, directors, members, authorized wrongful conduct and/or were personally guilty of defamation, malice, negligence and or recklessness.

E.A. Rico Williams created a "false narrative with misguided factual information, through hearsay, fabricated statements, falsified meeting arrival times, inferred that ten officials communicated an improper working relationship with the Plaintiff and included two schools and implied that the Plaintiff did not meet the required four meetings which she did meet while officiating football and volleyball in the fall before the 2015-2016 basketball season began.

The First and Second interrogatories requested support the complaint and refute all allegations made by the Defendant's with attention to the first correspondence made by E.A. Rico Williams and the letter of termination sent by E.A. Williams. The Defendants must provide all information to the Plaintiff.

The Defendants are attempting to hoodwink the presiding judge by presenting distorted information pertaining to the operation of the South Carolina High School League/ SCBOA and the responsibilities of the individuals that serve as leaders as well as the use of the Arbiter System and the organizational dichotomy of the various sports organizations affiliated within the South Carolina High School League. The Plaintiff has provided officials information and would like the judge to pay close attention to the following pages; 1,5,6,8,9,10,18,19.The Plaintiff has also provided documentation to prove that every sports organization is a separate entity as listed in the Arbiter Printout and the Blocks communicated were utilized to blight the plaintiff. Officials may block only three teams for which they do not wish to work or three partners with whom they do not wish to work, the Defendant E.A. Rico Williams purposefully indicated ten basketball officials

ENTERED COMPUTER

falsely, it is not uncommon for an official to have blocks and it is not a justification for termination. According to the SCBOA District I Contract and the Code of Ethics, the Plaintiff did not perform in any manner that would justify her termination. The Plaintiff met all requirements and was given a schedule for games for the 2015-2016 season, if the Plaintiff did not meet the requirements she would have no assigned games for the 2015-2016 season. The Defendants were in collusion to defame the Plaintiff and their behavior is evident in all communications.

The actions of all Defendants exposed the Plaintiff to public ridicule which caused her to be shunned and avoided. (Recent rejection to officiate with the YBOA organization). The serial defamation has caused the Plaintiff to sustain substantial injury to her professional reputation and her good will.

Respectfully Submitted,

Aminah A. Richburg Pro Se

217 Plum Creek Lane Greenville, SC 29607

864-419-6707

Greenville, South Carolina

March 24, 2016

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 4, line 19-25; March 20, 2017, Judge Gravely

It looks like hers was filed first; is that correct?

MS. RICHBURG: Yes, sir.

THE COURT: All right. Let me hear from her first then.

All right. I'll be glad to hear from you.

MS. RICHBURG: Okay. Your Honor, I, Aminah Richburg, the Plaintiff, have asked for compensation with the first and second interrogatories to be used as tools to obtain facts due to limitations with knowledge and memory --

THE COURT: I guess what -- you tell me what you've asked for that they haven't provided to you.

MS. RICHBURG: Okay.

THE COURT: Let's just kind of cut to the chase.

MS. RICHBURG: Okay. I can do that, Your Honor.

With the first set of interrogatories, there were, in all, 18 factual information requests that were made. Out of the factual requests made in the first interrogatories, the Defendants have failed to provide the factual information for interrogatory 1, 5 -- 1, 4, 5, 6, 7, 8, 9, 10, 12, 13, 16, and 18.

When I submitted my motion, I gave detailed information all descriptive information pertaining to why I'm asking for the information and the information that the Defendants provided.

In the second interrogatories, the interrogatories

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 5, line 19-25; March 20, 2017, Judge Gravely

for the second one is for interrogatory 2, 3, 4, 5, 6, 7, 8, 11, 13, 14, and 15. The only -- the responses came from Mr. Montgomery that represents the South Carolina High School League. Ms. Hurley, who represents E.A. "Rico" Williams, has failed to send any type of responses for the second interrogatories.

So I've only received answers for the first set of interrogatories from the Defendants. And when I communicated in the first interrogatories information I didn't receive, that's from both of the Defendants.

And then in the second set of interrogatories, I received factual information only from Michael Montgomery. I did not receive any information from Ms. Hurley since I filed for the second interrogatories.

THE COURT: All right. And is this your motion to compel that was filed on October the 11th?

MS. RICHBURG: Yes. That's when it started.

THE COURT: All right. And that's -- you know, that's where it covers all your -- and you've got very good detail of all the issues there.

MS. HURLEY: Your Honor, if I may clarify.

THE COURT: Well -- all right.

MS. HURLEY: I'm sorry.

THE COURT: Go ahead.

MS. HURLEY: I think she filed something subsequent

Testimony of Aminah A. Richburg , Transcript of Proceedings, page 6, line 19-25; March 20, 2017, Judge Gravely

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to what was filed in October that is -- I believe --

MR. MONTGOMERY: January.

MS. HURLEY: She filed something in January that's the subject of today's motion hearing.

THE COURT: Okay.

MS. RICHBURG: The first motion was filed in October. That was with the first set of interrogatories.

THE COURT: All right. And that has been addressed?

MS. RICHBURG: It was not addressed. That's why --

THE COURT: I guess -- has there been a hearing on this?

MS. RICHBURG: Well, the hearing took place. The Defendants presented a protection order.

And so the Judge -- she did not -- she was not prepared. She didn't even have a copy of the protection order. And what she communicated to us was that she was going to look over the information for the protective order. And she just advised counsel to communicate with me to see what interrogatory information that I was asking for. But --

THE COURT: All right.

MS. RICHBURG: -- nothing was ever discussed.

THE COURT: Let me -- because you filed something in January. I'm -- what is it called? Is it something a little different?

Testimony of Aminah A. Richburg , Transcript of Proceedings, page 7, line 19-25; March 20, 2017, Judge Gravely

MS. RICHBURG: It says -- the one that I filed in January is -- it's second motion -- second notice of motion to compel first and second interrogatories request for a hearing. That was filed in January. That was on the 13th of January.

THE COURT: Okay. For some reason, the binder did not get that out. It says, Document error.

MS. RICHBURG: Yes. And, Your Honor --

THE COURT: So I do not have a copy of that before me.

MS. RICHBURG: You do not.

And, Your Honor, I'm going to just bring to your attention that I have filed maybe about --

THE COURT: Hold on. Let me get this. Let me get this.

MS. RICHBURG: Okay.

THE COURT: Does anybody have a copy of this? Do y'all have a copy that y'all can --

MR. MONTGOMERY: Your Honor, I have a copy that I have not marked on.

THE COURT: All right.

MS. RICHBURG: Could I make sure that that is the copy that I have for today?

THE COURT: Yes.

(Pause.)

Testimony of Aminah A. Richburg , Transcript of Proceedings, page 8, line 19-25; March 20, 2017, Judge Gravely

MS. RICHBURG: That's not the same. Because it would have -- you don't have the first and second interrogatories. This is not the one I have.

If someone could make a copy of mine, Your Honor. That's the one that --

THE COURT: Well, hold on. I think I can find it another way. I may be able to pull it up.

MS. RICHBURG: Okay. Thank you.

(Pause.)

THE COURT: All right. Now, I'm on the same page, 1 of 94, I see.

MS. RICHBURG: Yes. I'm sorry.

THE COURT: Okay. So we're here for the second -- okay. And the only -- and the computer file that I had had your first motion. And that was what I was looking at. But we're here for your second motion. Okay. And you very, specifically, have laid out all of the questions.

All right. Anything else you would like to tell me about that?

MS. RICHBURG: Well, with the motion to --

THE COURT: Yes.

MS. RICHBURG: Sir, the reason why, you know, I'm asking for this compensation with this information so it can be used to reveal the truth and produce justice and

Testimony of the Court , Transcript of Proceedings, page 9, line 19-25; March 20, 2017, Judge Gravely

correctness with every question that I have with the interrogatories.

Everything really conspired with an e-mail that was sent by the Defendant, Eco -- I mean Rico Williams. He initiated everything. Nothing was initiated by Aminah Richburg, who is standing before you as the Plaintiff. His insidious behavior resulted in a difference of --

THE COURT: Well, I'm just talking about discovery here. I don't -- I mean --

MS. RICHBURG: Oh, okay. I got you.

THE COURT: I mean, I'm not talking about the case. But it looks like this is the same thing that was filed before and you already had a hearing on.

MS. RICHBURG: Well, that's the thing, Your Honor. It never was discussed.

THE COURT: Okay. Let me hear -- let me hear -- just so I can get a handle, let me hear from what y'all -- y'all help me here.

MR. MONTGOMERY: If I may --

THE COURT: Yes.

MR. MONTGOMERY: -- my understanding of sort of the history, how we got here with discovery. There was a motion -- a motion to compel filed very early on in the case. I had asked Ms. Richburg for an extension. She did not respond. I e-mailed her.

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And I wrote her a second time and said, You've not responded. I assume you've -- you have no problem with an extension. She didn't respond to that and then filed a motion to compel because we didn't serve our responses within 30 days. We had a hearing on that. Judge Couch denied her motion to compel.

In the interim, we had answered the discovery for the first set of interogattories. She then filed a motion to compel based on the answers themselves. That was scheduled for a hearing, I believe, in November. And it was, also, scheduled at the same time that I had filed a motion for a protective order on some of the documents I was willing to give her.

The day before that hearing on her motion to compel and the protective order, the three of us had a conference call and we talked for about an hour. And we went through the documents, some of which we said -- we needed some clarification on what exactly she was asking for. She provided some of that. We agreed to look. I responded -- excuse me. Let me back up.

So we had that conversation. When we got in front of Judge Verdin for the protective order hearing, we told her we had talked, we sort of maybe narrowed it down. And she said, If y'all have talked, let me give you 30 days. Y'all, you know, update your responses based on this

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conversation that you had trying to work it out, and update your responses within 30 days. She also -- we talked about getting the Plaintiff's deposition scheduled.

So I know -- I'm not exactly sure when Ms. Hurley responded. But I know I sent a letter, I believe, that was dated December 2nd that provided some additional information and clarified some of my responses. There were some objections, I think. But that sort of transpired in December. And then we got this motion. We'd gotten a second set of discovery in the meantime. And then we got this motion in January.

So some of this we have discussed, it's my belief that some of this, at least, with respect to the first set of discovery that we have discussed. Some of it we've answered. Some of it we don't have documents. And we've said that, or tried to explain what they mean. And so then we got the second motion in January.

THE COURT: Okay. Is that a pretty fair representation of the history, not the substance, but the history of how we got to this point here today?

MS. RICHBURG: I would agree with some. The reason why I have so much detailed information is because Judge Couch instructed me that in my motion to compel -- because Attorney Montgomery is correct. When I asked for the motion to compel is when I did not receive the

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documented -- I mean, information in 30 days.

So Judge Couch was the one that sort of directed me to say when you file a motion, you must give details as to how and why you're asking for this information. So that's why you see all of these --

THE COURT: It's very detailed, too.

MS. RICHBURG: Yes. But that's why I'm doing it. I know that I am pro se. I don't have expert knowledge. But I try to function as best as I can. So that's why I make sure. Because everything is factual. And that's as it should be.

THE COURT: Well, let me ask -- let me ask them.

What in your mind have y'all not given -- or have you given?

Ms. Hurley.

MS. HURLEY: Thank you, Your Honor.

I -- I don't know if you've had a chance to see this, but I did file a short response to the motion to compel about a week ago. And I have another copy here.

But I have laid out -- I have laid out the history of our responses, Mr. Williams responses, and sort of identified in there the -- this, Your Honor, just to give you some indication is a copy of everything, my responses to her. We've served multiple responses, along with 38 pages of documents from Mr. Williams' file, or that you

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could get from the -- from the District One records.

The last response we served was on January 18th. And that was to produce a confidential document. We were waiting on a protective order to be entered. And once we had that, we felt it was safe to go ahead and produce that. Because the -- the document we were waiting to produce had a list of the officials who had blocked Ms. Richburg from their assignments, meaning that they had, for some reason, indicated that they did not want to be assigned with Ms. Richburg. That was a document that we produced.

But, prior to that, we had produced everything that we either had, or felt like was appropriate. There were some things we objected to.

For example, she's asked for Mr. Williams' tax returns. We feel like that has absolutely no bearing or relevance to the incident action. She's asked for information about the gender and -- of -- gender and ages of other officials, which, clearly, is not a relevant issue in this case.

She's asked us to give -- she asked for the affiliations of all the District One board members. What we did is we gave her -- the District One board is the body that decided that Ms. Richburg's application for readmittance to the South Carolina Basketball Officials

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Association for District One would not be accepted if she reapplied for 2016 to 2017.

We provided the full names of all the board members, their home addresses, and their e-mails. She, also, asked for their affiliations. We weren't clear on what that meant. But I assume she wants to know what their job information is. And we don't have all that. I mean, these are people who volunteer to do these basketball --

THE COURT: I'll let you respond when she gets through.

MS. RICHBURG: Okay. Thank you.

MS. HURLEY: And so I know that that's something we've objected to.

I can't remember, but I've, basically, outlined it in here. Now, if there's something else specific -- one of our problems has been it's not quite clear what it is exactly that she still feels like she needs in order to proceed with her case. So if -- if we could narrow it down to say this is exactly what I'm looking for, that would be helpful.

But we feel like we have produced everything we have that is not otherwise objectable.

THE COURT: All right. And do you have anything specific, Ms. Richburg -- or you wanted to respond.

MS. RICHBURG: Yes, sir. I wanted to respond.

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Based on the -- all the information that I'm asking for would support everything that I communicated in the first complaint that was filed on March, I believe, the 31st or -- yeah, on March the 31st.

So everything that I listed in my complaint, everything that I've list in the interrogatories, it supports everything that I've communicated in my complaint based on the behaviors and the actions of Rico Williams and the South Carolina High School League.

What the attorney just communicated --

THE COURT: I guess -- let me ask you this. What, specifically, do you want them to provide?

MS. RICHBURG: Everything that -- that is in here. That's why I specifically -- you can see that there's some numbers that I haven't listed, meaning that whatever information they gave me was acceptable.

But if they failed to give me the information, that's what I'm asking for. Because it supports everything that I communicated in my first complaint, as well as it counters what was communicated by Mr. Williams when he initiated this e-mail that caused the defamation of the Plaintiff.

THE COURT: All right.

MS. HURLEY: Your Honor, one other thing just to throw out there. She says there was a set that we never

Testimony of Susan Hurley , Transcript of Proceedings, page 16, line 19-25; March 20, 2017, Judge Gravely

answered. That's not true. We -- we answered it timely. I asserted a number of objections where I could answer. I said we would and --

THE COURT: I'll let you respond. You don't have to wave your hand.

MS. HURLEY: -- and there -- for a number of items in that second set, we had to rely on the South Carolina High School League to provide. So she has it from the high school league. She just didn't get it from us.

So I -- you know, our position is why should we have -- I mean, we don't have it. We're relying on the high school league to produce it. Once it's produced, it shouldn't matter where it came from. It's official league reference.

THE COURT: All right. Briefly, so we can move on to another motion.

MS. RICHBURG: Yes, Your Honor. As you know, I am pro se, so I am trying to follow the protocol.

I was told by Judge Couch that when I asked for the first set of interrogatories that I would receive a response from both Ms. Hurley and Mr. Montgomery. And that has been the practice.

Now, all of the sudden, maybe months later, I'm hearing from Ms. Hurley just now that now they're deciding when they are selectively making the decision when they

Testimony of Aminah A. Richburg , Transcript of Proceedings, page 17, line 19-25; March 20, 2017, Judge Gravely

want to respond or not. That is a part of the motion to compel so that I can make sure that I'm getting all of the factual information that I need.

If it is that they do not have the information, then I will do a request for admission, meaning that they have to say, Ms. Richburg, we don't --

THE COURT: I know what a request for admission is.

MS. RICHBURG: I know. I don't know. But I'm just -- I apologize for rambling.

THE COURT: I'm going to have to, obviously, look through this to determine and issue an order on the discovery part. Okay. Because you've gone through -- you've carefully laid it out in your motion. And I've got your motion here.

MS. RICHBURG: And, Your Honor, can I just say one more thing?

THE COURT: Yes.

MS. RICHBURG: Even with their responses, their responses are counterproductive, meaning Mr. -- Ms. Hurley and Rico Williams will acquiesce to whatever factual information is presented by Mr. Montgomery. Once Mr. Montgomery produces that information and it's not to their satisfaction, all of the sudden they're producing other information.

And I communicated that in the summary judgment

Testimony of Aminah A. Richburg , Transcript of Proceedings, page 18, line 1-25; March 20, 2017, Judge Gravely

information whereas it's almost like a flip flop. Oh, we're going to acquiesce to the South Carolina High School League to provide this information. But whatever information the South Carolina High School League provides, now, all of the sudden, when it does not meet their standards or what they think is factual information, then I'm receiving other documentation, some of it being altered, handwritten, very unprofessional. And I feel like it's highly objectionable.

So that is what I have been experiencing with both attorneys. And that was really the major -- that's what really propelled me to do the motion to compel so I could have the judge -- and we could all be on one court.

THE COURT: Okay. And the only motion you have pending is the motion to compel; right?

MS. RICHBURG: And the only other thing I did was the -- when they filed the summary -- I did, also, file a notice to dismiss motion and, also, dismiss summary judgment. So I did do that --

THE COURT: And that -- and that would be your response to their motion for summary judgment.

MS. RICHBURG: Okay.

THE COURT: I did see that. That's --

MS. RICHBURG: But those are the only two.

THE COURT: All right. Now, let's hear about the

Testimony of Sarah Hurley , Transcript of Proceedings, page 19, line 19-25; March 20, 2017, Judge Gravely

motion for summary judgment.

MS. HURLEY: Thank you, Your Honor.

Would you like me to give you a little bit of background facts --

THE COURT: Yes.

MS. HURLEY: -- about this case?

THE COURT: And let me just tell you, Ms. Richburg. You're going to want to -- you know, when she -- what I'm going to do is I'm going to hear from her --

MS. RICHBURG: And then you'll let me --

THE COURT: Well, y'all tell me. Would it make sense to hear from both of you and then let her respond?

MS. HURLEY: Probably.

THE COURT: Okay. I'll hear from both of them, then I'll let you give a complete response.

MS. RICHBURG: Okay.

THE COURT: So you may want to take notes.

MS. RICHBURG: Okay.

MS. HURLEY: Your Honor, thank you.

Sarah Day Hurley for Rico Williams.

I'll just briefly go over the background facts. There are two Defendants in the case, Rico Williams and then the South Carolina High School League.

Mr. Williams works for FedEx. But he has for over 20 years been a basketball official, which means he

Testimony of Susan Hurley , Transcript of Proceedings, page 21, line 11-25; March 20, 2017, Judge Gravely

So Mr. Williams had texted the Plaintiff and then followed up with a phone call. And they went back and forth and, finally, connected on the phone. But, essentially, he was trying to reach her. And this is all laid out in his affidavit, by the way, that we filed with our motion.

He was attempting to reach Ms. Richburg in order to do two things. One, he wanted to confer with her about her availability to officiate a non-league game that I think may have been at Furman. It doesn't matter, but it was a non-league game. And he had -- he wanted to make sure -- I guess there had been some question about whether the game was still on. He wanted to make sure.

As you can imagine, it's his responsibility to gather these people. And he wants to make sure he has their word they're going to be there. Because the game can't go forward if they don't have officials. So he wanted to ask her about that.

But he, also, needed to ask her a question about something that had been told to him. And this has all been produced to Ms. Richburg in discovery. But another official named John Williams had reported to Rico Williams a few days earlier that Ms. Richburg had attended a game and officiated a game wearing black jogging pants, tight pants that are not part of the officials approved uniform.

Testimony of Susan Hurley , Transcript of Proceedings, page 22, line 19-25; March 20, 2017, Judge Gravely

Excuse me.

And so Mr. Williams said to her, This has been reported to me. Is it true that you were wearing the black jogging pants? And basically -- and this is all, again, laid out in our affidavit and then in the briefs. But she gave him a very short response, said she was at work, and that she doesn't wear such pants, and is that all he had to talk to her about. And so he said, Yes. That's it. Okay. Well -- and he just let it go.

A few minutes later that same day after they had this conversation, she sent him a text message. And in the text message, she accused him of harassing her and said that she was going to report his "monopoly status" and how he manipulates the District One organization. She was going to report this to the league, and to his higher ups, and, basically, was complaining about his leadership.

So in response to the text message, Mr. Williams then wrote an e-mail to Ms. Richburg and addressed the whole history of their communications and, basically, offered at the end of the communication -- at the end of the e-mail offered to assist in a transfer to another district if she was no longer comfortable with the District One leadership.

And in this e-mail, he copied Skip Lax, who is the -- or was at the time the commissioner of officials for the

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South Carolina High School League, who Ms. Richburg knows who he was. And he, also, copied the District One board members. Because it was apparent in the e-mail that -- that she had expressed disapproval of his leadership actions, and was going to complain to the league. And Mr. Williams could see that this was not going to go away, that he had to address it, especially since she was alleging that he was harassing her. So it escalated from there.

But, essentially, her claim against Rico Williams is one of defamation. She says that he defamed her when he sent that e-mail.

Now, in her complaint, there's also -- it's not clearly pled, but there appears to be some claim of negligence against the high school league for failing to intervene. Because after this e-mail, Ms. Richburg sought to bring in Skip Lax, the commissioner of officials, and later sought to -- to solicit the assistance of Joedy Moots, who was the officials representative of the high school league.

Essentially, she was contacting people at the league to get them involved in her dispute with Rico Williams, which all started because he asked her whether it was true what John Williams had said about what she was wearing to the game.

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So we have filed a motion for summary judgment. We have exchanged written discovery requests. We have -- we have taken Ms. Richburg's deposition. We've submitted affidavits. And we believe the case is ripe for disposition on summary judgment.

And we have two grounds for asking for summary judgment for Mr. Williams. The first ground is based on the truth of what was stated in the e-mail. As Your Honor knows, truth is an absolute defense to a claim of defamation. And, in this case, liable because it was a written communication.

Now, in the e-mail, Mr. Williams said several things. And it's a lengthy e-mail. And I've laid it out in our -- we filed a brief today, Your Honor, with the Court electronically. And I can provide a courtesy copy, if you need it. But it should be accessible soon.

THE COURT: Right.

MS. HURLEY: Would you like a courtesy copy --

THE COURT: Yes. Well, you know what, here, I've got it. Defendant Rico Williams brief in opposition --

MS. HURLEY: This is -- I don't have a filed stamped copy. And I apologize for not filing it sooner. But I've had two parents in and out of the hospital in the last couple of weeks. So it's been kind of rough.

So in that brief, Your Honor, if you'll see -- the

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alleged defamatory e-mail starts on Page 2. And if you want me to stop and give you time to read it, I can do so.

THE COURT: Yeah. Let me read it.

(Pause.)

THE COURT: All right.

MS. HURLEY: All right. Your Honor, so we've addressed the items stated in the e-mail. And notably, everything in the e-mail is factual. He's just repeating facts. He's not making derogatory comments about her. He's not expressing negative adjectives. He's just reputing what he views as the facts.

So Ms. Richburg has claimed that it's not true, that she was blocked by other officials. Well, we have, in fact, produced the confidential documents showing the list of officials -- according to the league's records as to the officials who blocked her.

And we have a document in our record that shows she was blocked by 10 officials, and the dates of those blocks handwritten beside it. And then the league's counsel has produced additional documents showing the two high schools and additional officials who have blocked her.

So we have shown that it's absolutely true that at the time Rico Williams wrote this e-mail that Aminah Richburg had been blocked by 10 officials and two high schools, not including the two high schools where she

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blocked herself because her kids go there.

The second item is the complaint about her unwillingness to accept constructive criticism by other officials. That's in Rico Williams e-mail. He testifies in his -- I mean, in his affidavit. He testifies in his affidavit that, yes, it's absolutely true. And what he's doing is saying here to Aminah, these people have reported to me your unwillingness to accept advice and constructive criticism at times. And that is absolutely true. And we believe that's subject to the hearsay exception and perfectly appropriate for the Court to consider on this -- on this motion.

The last item is her poor meeting attendance. And Mr. Williams puts in here in his e-mail to her, We have a record of your coming late to meetings. And that is, also, true. And we've produced records from District One. Their treasurer keeps the records. And he keeps them on a computer. There's no sign-in sheet. It's done by roll call. And we produced those to Ms. Richburg. And so that is, also, substantiated by the documents we produced and, also, the affidavit of Rico Williams.

So we have produced records showing that these items in this e-mail are true. And all they have to be is substantially true. And we've proven that they are, in fact, true. And so unless she can now come back with

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evidence showing that something we said is not true, such that it constitutes defamation, we should be entitled to summary judgment on the basis of truth alone.

However, we have a second defense, which is the defense of qualified privilege. And that is sort of akin to you say it only to people on a need-to-know basis. A qualified privilege is oftentimes invoked in the employment setting where a supervisor might send an e-mail to human resources about an employee's job performance. That's considers -- considered to be a privileged communication because it's only communicated to people who have an interest in the subject matter. And it's communicated in a proper form. And I would submit that that is the situation here.

And, Your Honor, the Court -- the case law says -- and this is in our brief -- that it's the duty of the Court to determine whether a privilege applies when the facts are not in dispute. Obviously, if there's a question of fact as -- a question of material fact as to what was said or who it was said to, that would prevent the Court from ruling on this.

But in this particular case, it's not in dispute. The alleged defamation is set forth in writing in the e-mail. And there's no dispute as to who it was sent to.

For privilege to apply, it had to -- the

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communication had to have been made in good faith on a subject matter in which the person communicating had an interest or a duty, and made to a person or persons with a corresponding interest or duty in the -- in the subject matter of the communication. And that is true. The privilege would apply in those instances so long as the privilege is not exceeded or abused. But the privilege applies even if the statement would otherwise be actionable.

So, in other words, this second ground for summary judgment is independent of the defense of truth. We would not have to show that both apply in order to get summary judgment. We only have to show one or the other. And either one, we believe, is an independent ground for granting summary judgment to Mr. Williams.

Now, it's our belief that Mr. Williams' e-mail was made in a proper manner to proper parties. He puts forth in his e-mail -- or in his affidavit. I keep saying "e-mail." Sorry.

He says in his affidavit, look, I had the right as the District One director -- and this is absolutely true under the contract that Ms. Richburg had to sign, as all officials sign. He had the absolute right on his own to say to Ms. Richburg that she could not reapply for membership in the District One SCBOA, but he chose not to

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do that. He gave her the benefit of the doubt because she was directing her complaints against him. He decided to recuse himself and let the board decide whether to take any disciplinary action against her.

And, by the way, it's, also, spelled out in Mr. Rico's -- Williams affidavit that he invited Ms. Richburg to the meeting -- the board meeting at which her status was going to be discussed. And she never -- she never showed up for that. So she did not attend the meeting in which she was invited to address these issues with the board before they voted on any action to take against her.

But the point of this is that the board members historically deal with disciplinary actions of members. And so Mr. Williams thought it was appropriate to copy them on this e-mail to Aminah Richburg because he could see that something was likely to happen with respect to her membership, whether it be a suspension or termination.

Similarly, for the same reason, he copied Skip Lax, who is the league's commissioner of officials. He's in charge of membership. He has to notify officials when their applications are rejected. Certainly, this was within the scope of something that would be relevant, and something within his purview of needing to know.

The other point about that is that Ms. Richburg

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herself forwarded Mr. Williams' e-mail to Skip Lax and, also, Joedy Moots, both of whom are commissioners with the South Carolina High School League. So she clearly, also, thought that it was important to get them involved and had no problem with communicating these issues with them.

So, at the end of the day, we think if the Court has time to look at the affidavit of Rico Williams and look at our brief, you'll see that there's no dispute as to what communication was made, and who it was made to, and that it was made in good faith, and that the privilege would apply.

THE COURT: All right.

MS. HURLEY: Thank you.

THE COURT: I'll hear from him. And then you can tell me everything you need to tell me.

MS. RICHBURG: Okay. Thank you, sir.

MR. MONTGOMERY: Thank you, Your Honor.

THE COURT: Mr. Montgomery.

MR. MONTGOMERY: Again, my name is Michael Montgomery on behalf of the high school league.

I, certainly, join in to the arguments made by Ms. Hurley, especially with the defenses of truth and the privilege. We join in those and believe that those have been established.

I do -- in case -- I think it's been set forth in our

Testimony of Michael Montgomery , Transcript of Proceedings, page 31, line 1-25; March 20, 2017, Judge Gravely

brief, but if the Court has any questions regarding the relationship between the SCBOA and the high school league -- and the high school league bylaws, it gives the high school league the authority to organize these officials organizations for the purpose of certifying officials and supplying officials for high school league games. There's a basketball officials association. There's a football officials association. And then everybody else sort of falls into the South Carolina officials association.

And the -- under the SCBOA's bylaws, they have a certain roll carved out for the commissioner of officials, which is somebody designated by the high school league to serve in that role. Skip Lax serves in that role. He still does and was at the time of the case. And he is, also, an associate commissioner of the high school league. He has separate duties and responsibilities for the day-to-day affairs of the high school league. But he, also, serves as the commissioner of officials.

And some of the things that the high school league does -- or his role would be with keeping records. There's a computer software system called Arbiter that, basically, is the sort of software that you use to generate assignments, keep records, things of that nature. The high school league primarily does varsity contests

Testimony of Michael Montgomery , Transcript of Proceedings, page 32, line 19-25; March 20, 2017, Judge Gravely

from their office. Arbiter does the varsity scheduling. The local district -- there are 12 across the State. They do what we call sub-varsity, JV, and middle school games.

So the scheduling sort of goes through different arenas. But the high school league is in charge of certifying -- helping certify, training, providing educational materials. And the one thing that I think, you know, is important for this case is the one thing that the local districts reserve the right to control, and that's who they allow to be members of the local districts. It -- it -- one of the things that's spelled out is the commissioner of officials duties is if there is -- they notify officials when they are accepted or rejected, but only after the local district has determined.

So the high school league can't make anybody be an official of the local district. That decision is sort of left with the local districts who have the sole determination as to who's going to become a member.

And in terms of Mr. Moots, who was mentioned, Joedy Moots, he's not a commissioner or an employee of the high school league. Mr. Moots is, actually, a high school principle. And he serves as the officials representative, which is the representative of the officials association.

The high school league has an executive committee

Testimony of Michael Montgomery , Transcript of Proceedings, page 33, line 19-25; March 20, 2017, Judge Gravely

that sort of is the governing body. It's a representative body of 16 people. There are various entities that have a representative, the superintendant's association, the Department of Education. And the officials association is one of them. And that's who Mr. Moots was sort of -- that was his role during this time period. And -- and so I wanted to be sure I sort of clarified from a factual perspective what his role was.

In terms of any defamation claims against the high school league, I'm not really sure that's what's being sought here. Clearly, the high school league, Mr. Lax, did not make any communications to anyone, other than he responded to Ms. Richburg. Mr. Moots as well.

In our brief -- our position is that Mr. Moots wasn't acting on behalf of the high school league. He was acting on behalf of the officials association. Nonetheless, Ms. Richburg reached out to him, forwarded him Mr. Williams' e-mail and said, Please advise.

Mr. Moots gave his advice, his response. It did not sort of -- did not please Ms. Richburg. She -- there were some communications back and forth. But he, basically, said, I don't see anything that -- that Mr. Williams has done wrong, and things like that. But there was no defamatory communication or anything said about the Plaintiff that would support a defamation claim against

Testimony of Michael Montgomery, Transcript of Proceedings, page 34, line 1-5; March 20, 2017, Judge Gravely

the league.

What sort of was pled to some extent in the complaint was that there's a negligence claim against the league for not intervening and preventing, I guess, the ultimate result, which was the board -- the district board voting not to accept her application in the future, you know. There's -- if I'm taking that to be the claim, several defenses would apply.

One, what Mr. Lax did when -- when Ms. Richburg forwarded him the e-mail, he, basically, said, you know, this is -- this concerns a local concern to be addressed at your district level. He explained in his affidavit -- Mr. Lax's affidavit that it didn't involve a specific contest or a varsity contest and -- and, therefore, it was a -- it appeared to be a dispute between Mr. Williams and Ms. Richburg to be handled at the district level. So he, basically, deferred it to the district level.

So along with that, one, I don't see that there's any duty for Mr. Lax to force himself into that dispute to do it. It's allowed. If you want to call it a discipline issue, the commissioner and the board of directors have the right to -- to be involved with that. He deferred it to the board of directors of District One.

If it's a membership issue, which if you read Rico Williams e-mail, it says You're not going to be assigned

Testimony of Michael Montgomery, Transcript of Proceedings, page 35, line 1-8, 9-25; March 20, 2017, Judge Gravely

to any games until your membership status is reviewed by the district board of directors. Again, going back to the bylaws and the relationship between the BOA and the high school league, the BOA retains the right to determine who's going to be a member.

So that was a membership issue, but it's also -- it doesn't involve any varsity contest or any specific issues, other than sort of personality differences.

We raised in our -- in our brief that the high school league is a governmental entity, such would be subject to the Tort Claims Act. One -- one thing I did not raise in my memo, but I wanted to be clear I raised to Your Honor is under 15-78-60, which is the Tort Claims Act, exceptions to waiver immunity -- waiver of immunity, number five provides immunity --

THE COURT: Wait. What was the section number again?

MR. MONTGOMERY: 15-78-60, Section -- Paragraph five.

THE COURT: 15-78-60, Paragraph Five.

MR. MONTGOMERY: Which would be, basically, discretionary immunity, which says that the governmental entity is not liable for a loss resulting from the exercise of discretion or judgment by the governmental entity or employee, or the performance, or failure to perform any act or service which is in the discretion or judgment of the employee -- governmental entity or

Testimony of Michael Montgomery, Transcript of Proceedings, page 36, line 1-25; March 20, 2017, Judge Gravely

employee.

And given that Mr. Lax has the discretion as to whether or not to be involved, he exercised that discretion. And just because the Plaintiff does not like what he -- that he -- what he said or that it was a local matter, that's not grounds for a negligence claim.

Again, the sort of -- to claim that the high school league had some absolute responsibility to get involved sort of ignores the fact that it's the -- that it's the local districts that have the membership right to determine who's going to be a member. We can't force somebody to -- to be a member.

And so that's partly where Mr. Lax's decision not to become involved -- and, again, it was Mr. -- Mr. Moots and Mr. Lax said -- said basically, you know, we don't think that there was anything done wrong here by Mr. Williams. And that continues to be the case.

And just because the Plaintiff doesn't agree with that conclusion that they reached doesn't mean that it's negligence based upon the standards which, you know, as -- as an official she's an independent contractor. She's not an employee. She doesn't have any particular right to continue "employment" as an official. It's up for -- every year it's up. And there doesn't appear to have to be a reason to accept or not accept someone.

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So, again, for those reasons that we set forth in our brief, unless there are any questions, we will join in with the remaining defenses by Mr. Williams.

THE COURT: All right. Ms. Richburg, I'm sure you have a lot to respond to there. I'll be glad to hear from you.

MS. RICHBURG: Thank you.

I'm glad to hear that you have the patience, Your Honor. But what I have to say is pretty much in line with what you've heard from the Defense, but in a different perspective.

The Defendants refer to the e-mail. That's what I referred to earlier. This is what initiated everything. And the big dissertation that you received --

THE COURT: Well, let me ask you this just -- just so I can get it clear in my mind. Is the e-mail that -- is the -- I mean, I realize there's lots of background information --

MS. RICHBURG: Right.

THE COURT: -- but is the e-mail the basis of your lawsuit as far as defamation?

MS. RICHBURG: That's what initiated it.

THE COURT: Okay.

MS. RICHBURG: That's what initiated it. And that is why I was leading to this when I submitted the document on

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the 13th. You will see that I submitted the e-mails that I received from Mr. Williams starting in 2013 up until the present date.

In my complaint, I communicated that when I became a member of the South Carolina High School League through District One, which is the Greenville district in the State of South Carolina. Each -- each county has a district. Some counties if they're small, they're included in one district. Greenville County happens to be Greenville and Pickens County. And that's District One.

When I became a member then, there was a different president. Her name was Jenny Norris. And when I became a member, Mr. Williams approached me and communicated to me that he assigns games for officials, if I needed to make some extra money. Because he heard me in a conversation with another official say that I was officiating the game so that I could pay for my childrens tuition at Christ Church.

So he overheard the conversation and he approached me. So then I have the first e-mail that I received from him, November the 22nd, 2013, where the solicitation started.

At the time when I became a basketball official, I was not knowledgeable of the South Carolina Basketball Association's bylaws, their Constitution, the code of

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ethics. The only thing I was required to do was fill out an application.

I'm an employee with Greenville County schools. So I guess that's what gave Ms. Norris the green light. And I have a background in physical education. I've officiated when I was in college. That was a part of my work study. So, yes, I started officiating basketball with District One. But, you know, I did it in college. And I have a long history of officiating.

Moving on. The relationship that I had with Mr. Williams was simply business. He would always send me an e-mail or a text giving me an assignment for a game. So what you see in the text when -- remember, this is what he communicated. So I am challenging what he's saying. This is what he sent.

But to give you an account of it, he left me a text message saying, Please give me a call at your earliest convenience. It's typical. I've gotten those from him several times. So what I did -- I didn't -- at my earliest convenience, I thought it wasn't a big -- you know, no rush because he said at your earliest convenience. I had already communicated with Mr. Williams that I was available for the game, I believe, on the 4th.

So he kept texting me. So that's the basis of the harassment because he kept texting me. So -- and amongst

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other things.

So after -- when I called him back, I was at work. I was thinking it was a quick call, Rico, I'll let you know that I'll be available for the game. So that's how the conversation went.

Aminah, remember I scheduled you for the intramural game at Furman University.

I said, Yes, I sent you a text.

And he said, Oh, by the way, someone told me that you were wearing tight sweatpants to the basketball game at Beck.

And I got real quiet because I was not prepared to hear that. That's never been a part of the conversation.

And so I just said to him, I don't own or wear sweatpants. Is that all?

And then he said, Well, do you have a problem with discussing this?

And I just said, I just told you I don't own or wear sweatpants. Is that all? And then I said to him, I am at work. And I really can't talk at this time. And I need to get off the phone. I said, I sent you a text saying that I was available and I will be there. And that was the end of the conversation, point blank.

But what Mr. Williams sent out -- that's why in my complaint I communicated that what he sent was a

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fictitious narrative based upon the conversation. You heard Ms. Hurley read the conversation -- I mean read the narrative. So this is all coming from Mr. Williams.

THE COURT: All right. But is that -- is there any question that that was the e-mail that was sent out?

MS. RICHBURG: This is the e-mail that he sent out.

THE COURT: All right. And what in there is not true, other than you said that wasn't the conversation? Was there anything in there that was not true?

MS. RICHBURG: When he put on there that, If you remember last year during a JV tournament, all of that was added in. So the only thing was just a quick in and out conversation.

So he added that. That's why I said it was a fictitious narrative, meaning that the information he was presenting was a presentation to blight [phonetic] my integrity in terms of my professionalism with my dress as a basketball official. So that's why I addressed it that way.

When I sent the follow-up message to Mr. Williams, I never asked for a transfer. I didn't mention any of that. What I did communicate -- and as you see, I just said, Please continue with the harassing communications. That means that, you know, if you're communicating and it's not about a scheduled game or if you're communicating about

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hearsay, someone told me that you were wearing tight sweatpants -- that, to me, clearly blighted me and my professionalism in terms of my dress.

I am, as I said to you before, a district employee with Greenville County schools. I'm a former administrator. When it comes to professional dress, that's one thing that I hold highly because I present -- I always present myself professionally at all times. So that's why I communicated that to him.

I, also, said that previously District One leaders presented a higher level of professionalism. I was only communicating to him that when he says something about my dress -- and to me it was gender based, based on when he said something being tight, meaning -- I mean, that's how I took it.

So what I said to him was that former leaders made officiating enjoyable. So I was only communicating to him my disdain to what he communicated to me to say, at this particular point, this is just how I felt.. So that's all I said that it made it -- that it was -- that -- I'm sorry. That previous District One leaders made -- okay. Let me just move on.

THE COURT: Was this after he sent the e-mail?

MS. RICHBURG: No. See, this is what he did.

THE COURT: Okay.

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MS. RICHBURG: He took -- he didn't even send the e-mail, Your Honor, until the next day.

THE COURT: Okay.

MS. RICHBURG: So he sat down and contemplated what he would do. So I thought -- that's why I thought it was insidious and he was making an attempt to blight me as an individual. Because he didn't send anything to Skip Lax that day. He didn't tell me, Aminah, I don't want you to officiate the games at Furman University. I don't want you to officiate the games that Saturday at -- for the junior varsity tournament. He didn't say any of those things to me. He did not communicate. I didn't hear anything from him.

And the reason being is because Mr. Williams has a business. Officiating is a business. You have a lot of organizations in the upstate, youth organizations, adult organizations, and all of them want officials.

So if they can find somebody that has any context with officials, they can say, hey, we have eight games. Can you provide eight officials for these times for these games? And whoever provides those officials, they get a cut.

THE COURT: Right. And I guess what I want you to address, specifically, again, is what in the e-mail is not true?

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MS. RICHBURG: Okay. So what in the e-mail is not true is where he starts -- if you remember -- and I listed this in the summary. It's all detailed in the summary as well, sir. But I -- would you like for me to go through the summary? Would that be more helpful?

THE COURT: Which -- which summary are you talking about?

MS. RICHBURG: I did two challenges to the affidavits --

THE COURT: Okay. Your -- okay.

MS. RICHBURG: Yeah. I did two of them. So if you want me to just do those two, then I could just line for line address everything that --

THE COURT: All right. And what did you call them? This is your --

MS. RICHBURG: This is the challenge to the reliability and validity of the affidavit of Defendant Skip Lax. And then I did another one for Rico Williams.

THE COURT: All right. So you tell me what you -- all right. I've found that, I think.

MS. RICHBURG: So I'm thinking it would be easier for me to just go through the summary since this is what we're addressing. And I've already --

THE COURT: All right.

MS. RICHBURG: Would you rather me do that, sir?

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THE COURT: Yeah, if you could briefly.

MS. RICHBURG: Okay. So if you will recall, when Ms. Hurley mentioned the employment of Mr. Williams at FedEx, that's where I'm starting with when he says, I'm over the age of 18. And he's employed with Federal Express. If you look at two underneath it, I stated that I asked for the tax returns to see where he would list what he does for his business, meaning I know he has a business with providing officials for different organizations. He had not supplied that.

So that's why you see that under number two where I said that I asked for that documentation. She just lists that he works for FedEx. But she did not address that Mr. Williams has a business where he provides officials for different organizations in Greenville.

For number three where it talked about Mr. Williams experience as an official, they sent me information with all of the members for the South Carolina High School League from 2013 to 2016. And with the factual information that was communicated by Ms. Hurley and Mr. Montgomery, they mentioned the document that came under the protection order where they're stating that Mr. Williams stated the truth about the 10 officials that blocked the Defendant.

If you will look, I placed a chart. And in that

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 46, line 14-25; March 20, 2017, Judge Gravely

chart -- I think the chart is under number -- it starts -- you can look at number 29.

THE COURT: All right.

MS. RICHBURG: When I gleaned all of the information that was sent by the South Carolina High School League and Ms. Hurley where they're saying truth -- to say that the summary judgment that they're asking for is based on truth. Out of the 10 officials that they sent under the protection order, seven of those officials aren't even South Carolina High School League basketball officials. And that's for the entire state of South Carolina. I gleaned all of the list of all of the officials.

So when you look at that chart where it says --

THE COURT: Well, does the affidavit say that -- it just says 10 officials.

MS. RICHBURG: Right. It says 29 in my e-mail to --

THE COURT: No, no. The e-mail from him says 10 officials. It doesn't limit on any particular -- it doesn't describe them as a specific...

MS. RICHBURG: See, we're dealing with --

THE COURT: I'm dealing with his e-mail. That's what we're talking about.

MS. RICHBURG: Right. And what I'm saying is --

THE COURT: And I don't need all that background -- I mean, all the stuff that you've got -- I mean, you know, I

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 47, line 1-3; 4-25; March 20, 2017, Judge Gravely

want you to tell me, specifically, about the e-mail that he sent you, which is the basis of your complaint. You tell me all the reasons why that is not true.

MS. RICHBURG: All right. So, again, I'll just go through it where it says, If you remember, starting there. That is not true. Where he put, Even though your responses were short, terse, and rude, that is his -- he is stating that. That is not -- that's coming from him. That is his opinion.

The e-mail -- I've already communicated that I had an old flip phone at the time. So I don't have access to this e-mail. So I -- I can't even recall what I sent. So I've already communicated that.

THE COURT: Okay.

MS. RICHBURG: When he says, I received requested information, there was no requested information sent from Bob Wnukowski or Kevin Brown. They did not request any information.

And when it says, You were marked off by two schools, in the [inaudible] system, the two schools that are marked off are Southside High School where I attended high school and Mauldin High School in the zone which I reside.

But in the context in which the information was used -- that's what I communicated in my first complaint that in the context in which it was used, it was used to

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blight me to say that she doesn't get along with officials. She has these schools that have blocked her. Therefore, there is justification in my termination of her as a member.

So that's where -- when it says by the 10 officials. At that particular time, there are no 10 officials that have blocked me. We're speaking South Carolina Basketball Officials Association. So when they sent that e-mail to say 10 officials blocked me, 10 officials did not block me from the South Carolina Basketball Officials Association. This is what this is in reference to. I don't even know -- I officiate football. I officiate volleyball. I do lacrosse. And I do softball.

THE COURT: All right. Keep going on the e-mail.

MS. RICHBURG: Okay. I'll keep going. Okay. So I will say that the two schools as represented by Mr. Williams were used out of context.

THE COURT: Okay.

MS. RICHBURG: The 10 officials were used out of context.

THE COURT: Okay.

MS. RICHBURG: When he communicated, Many of them have indicated to me your unwillingness -- no one came -- there were no 10 officials that came to Mr. Williams during the 20 -- I mean 2015, 2016 basketball season to

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 49, line 1-15; 17-20; March 20, 2017, Judge Gravely

say that I have an unwillingness to accept constructive criticism. That did not happen.

THE COURT: Okay.

MS. RICHBURG: So that is not true.

Then he puts, Additionally, before the season, I required officials work in other South Carolina schooling sports to attend four games. And I have, Your Honor. If you want to look -- I don't have a copy for you to keep. But this is what was sent to me --

THE COURT: Well, just tell me what it is.

MS. RICHBURG: Okay. It's just evidence that shows that I attended four games, which was required. So when he put that I did not attend four required meetings, I did attend four required meetings. And I have the documentation to support it. So that is not true.

Then --

THE COURT: Well, actually, he states that you attended late. Based on the sing-in sheets, you didn't -- it didn't constitute four because you didn't make the whole meeting.

MS. RICHBURG: And that is why in my interrogatories I asked for copies of sign-in sheets. And they do not exist.

THE COURT: Okay.

MS. RICHBURG: Because at the meetings I attended --

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this is for all officials. There is no sign-in sheet for officials. When you come, you get credit for attendance, period. That's how it is done. No one is sitting there giving any indication in terms of any time anyone attends the meeting -- I mean arrives at the meeting or departs. There is no in and out sign-in sheets.

THE COURT: Okay.

MS. RICHBURG: So that was part of the interogattories. So when he presented these times, those were times he created.

THE COURT: Okay.

MS. RICHBURG: There's nothing on record to support any of that. And that is how he, for some reason, communicated some justification that I attended two and a half meetings, which is a false statement.

THE COURT: Okay.

MS. RICHBURG: In addition, when he listed all of these other meetings, we were only told that we were required to attend four meetings.

THE COURT: Okay.

MS. RICHBURG: And directors in the past and even for other sports -- when the directors in all sports know that you're doing other sports, there's a level of camaraderie and empathy --

THE COURT: All right.

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 51, line 1-21; March 20, 2017, Judge Gravely

MS. RICHBURG: -- if they know that you're officiating another game.

THE COURT: Okay. I mean, you got -- you're just address the meeting there. All right.

MS. RICHBURG: And then when he says, Upon realizing these facts, I contemplated removing you from the tournament. Well, my argument was that if I did anything that was inappropriate, that was unprofessional, that would blight myself where I --

THE COURT: Well, this is just saying what he contemplated. I mean --

MS. RICHBURG: Oh, okay. All right. Well, okay.

So then when he says, Without repeating word for word your comments concerning professionalism, declining standards, I did not state -- if you would read the e-mail, I never stated that my membership was not being served adequately. I have already communicated that I'm a single parent. And for me to even officiate in a different district would be taxing and stressful because of the time required to go on the road to --

THE COURT: Well, he's just stating his opinion that -- what he feels that your comments are. Okay.

MS. RICHBURG: Okay. And then when he says, I and we, I'm like what is I and we? I don't clearly understand that. But this is -- this is coming from Mr. Williams. I

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never communicated any of those things. The only thing I communicated to Mr. Williams is, frankly, the conversation I do not wear sweatpants --

THE COURT: All right. Let's just stick to the e-mail.

MS. RICHBURG: All right. And, as I said before, there was no discussion about me transferring to any district. This is -- everything was coming from Mr. Williams.

THE COURT: All right.

MS. RICHBURG: And the other thing to support when I -- in the e-mail when it said something about communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization. The only thing that I was referring to was when I looked at the code of ethics, it says, quite frankly, that solicitation is not allowed.

So that's all I was communicating was that I thought that there was a conflict of interest because he's calling me about --

THE COURT: Well, that's your statements and not his.

MS. RICHBURG: Yes.

THE COURT: I mean, again, I'm going to have to review this matter.

All right. Any final points?

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MS. RICHBURG: Okay.

THE COURT: Because they've got to respond, and it's 10 till 5:00.

MS. RICHBURG: Right. I understand, Your Honor.

THE COURT: Go ahead.

Ms. RICHBURG: What I heard from the Defendants, they were saying that in their summary judgment that it all should be based on truths. Well, my argument is that the information is not truthful and a lot of the facts are taken out of context and are presented in a false narrative to blight me.

On the South Carolina High School League site, it lists the responsibilities of the officials representative. It clearly communicates the responsibilities of the commissioner.

So the commissioner, it was his job to intervene. If you will see in the e-mails, the commissioner just -- quite frankly, just brushed it off. And he did not address it.

When I communicated then to the officials representative on-site, the officials representative shared my communication with him with Rico Williams. And that was discussed in the board meeting.

THE COURT: Okay.

MS. RICHBURG: So I felt that that information was

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confidential. Anything that I communicated and shared with Mr. Moots -- he's an officials representative. None of that information should have been shared at that board meeting.

But what Mr. Moots failed to share at the board meeting, as Mr. Montgomery mentioned, that -- in our correspondence when he sent an e-mail and when he acknowledged I have known Rico Williams for many years and was giving him all of these accolades. And then I responded to him to say that you're sounding more like a directors representative than an officials representative.

So once I sent my other plea to Mr. Moots in the last e-mail that he sent me --

THE COURT: Well, now, we need to stick to things relative to him. I know you're bringing a lot -- a lot of stuff here. But we're talking about, you know, responding to their motion for summary judgment.

MS. RICHBURG: Right. And the --

THE COURT: And defamation.

MS. RICHBURG: Right. And the reason why I'm mentioning Mr. Joedy Moots is because Mr. Montgomery mentioned Mr. Moots. So I'm just following up just to communicate with you that in the communication that I had with Mr. Moots when I communicated what was going on with my situation, Mr. Moots did say, Aminah, you are correct.

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 55, line 1-13; 14-20; March 20, 2017, Judge Gravely

I only went on what was said in the e-mails and texts. I didn't mean that you were insubordinate. But if someone on my staff talked to me like that, I would consider it insubordination. Believe me, the basketball directors and I have gotten into many disagreements because I'm always taking up for my officials. But you can't win an argument with your director because they have too much power within the organization. You have to find a way to get along. Like I said --

THE COURT: All right.

MS. RICHBURG: -- I have no knowledge of your officiating ability. I can definitely see that there's a personality conflict --

THE COURT: I'm sorry. I don't see how that relates to any of the issues that we're discussing here.

MS. RICHBURG: The only reason why I'm bringing it up --

THE COURT: I mean, I don't need detail on every little thing on this e-mail. Because we're going to be here all night if you start reading every e-mail.

MS. RICHBURG: Okay. The only -- the only reason why I read the e-mail is just to bring clarification to say that even when I responded to the officials representative, the officials representative did communicate to me that my plea -- that in my plea that I

Testimony of Aminah A. Richburg, Susan Hurley, Transcript of Proceedings, page 56, line 6-10;19; 20-25; March 20, 2017, Judge Gravely

was correct and that the position that Mr. Williams has taken was one that was unwarranted.

THE COURT: Okay. Now, that -- I mean, see, that was a lot easier than reading the whole thing.

MS. RICHBURG: Okay.

THE COURT: All right. And, again, I'm not trying to cut you off, because I want you to tell me everything you need to. But I've just got to, you know, focus down on what the issues are here.

All right. Anything else you want to provide?

MS. RICHBURG: And the other thing is that the South Carolina High School League, they fall under the Freedom of Information Act. They are a governmental entity.

So anything pertaining to torts, it applies to the South Carolina High School League as well. They are not a separate entity where they don't fall under the same jurisdiction if their behaviors are that of unjust behavior -- organizational behavior that is, sir.

THE COURT: All right. Any brief response?

MS. HURLEY: Just quickly, Your Honor. I just wanted to remind you that this all started with a text that Ms. Richburg sent to Rico.

THE COURT: Yeah.

MS. HURLEY: And that's in the e-mail. He repeats it. And her text is, actually, pled in the complaint,

Testimony of Michael Montgomery, Transcript of Proceedings, page 57, line 6-25; March 20, 2017, Judge Gravely

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too.

THE COURT: Okay.

MS. HURLEY: So there's no issue as to what the text said.

THE COURT: Okay.

MR. MONTGOMERY: And, Your Honor, if -- if it matters -- if it doesn't, let me know. But to address the blocks where Ms. Richburg said some of the blocks weren't basketball officials, we explained when we produced it, the high school league has access to all varsity sports that she officiates.

So those 10 blocks, three of them were basketball officials. And the other seven were from other sports. The blocks that Mr. Williams produced, which I can hand up if you'd like, but it -- it sort of verifies everything -- and we've attached these as exhibits to our motion -- to our memo.

But for the blocks that were produced subject to the protective order, in the top right, it's got Bob Wnukowski, who's referenced in the e-mail where he says, I requested information from Bob Wnukowski and Kevin Brown. Well, here you see Bob Wnukowski, he's the administrator who pulls the 10 blocks that would be accessible by the BOA for sub-varsity contest. So that, actually, supports the fact that Rico didn't make them up. He asked Bob

Testimony of Michael Montgomery, Susan Hurley, Transcript of Proceedings, page 58, line 1-14, 15-24; March 20, 2017, Judge Gravely

Wnukowski to provide them.

Secondly, he, also, mentions Kevin Brown. Kevin Brown was the treasurer of District One. And we've attached his memo -- exhibits to our memo. His sign-in sheets -- or he created a document based on an Excel spreadsheet. And he writes it and signs it, Kevin Brown, I attest that this is true, where he takes all of those dates that people came in late. It's not just Ms. Richburg. There are other officials where he says, Came in at 6:50, came in at 7:15, left early.

MS. HURLEY: And he kept it in real time.

MR. MONTGOMERY: And he kept in real time. But he went back from the spreadsheet and created this document which was produced in this case.

The other thing, too, Exhibit E to my memo is the e-mail that Ms. Richburg forwarded to Skip Lax. And about halfway down, it says -- or Ms. Richburg writes, It is true that I attended three meetings this year. That sort of confirms what Rico said, which was the equivalent based on the time sheets of two and a half.

So she's admitting when she sends this to Mr. Lax that she didn't attend all four meetings. I wanted to be sure that that was referenced --

THE COURT: Right.

MR. MONTGOMERY: Right. So unless there's anything

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 59, line 5-25; March 20, 2017, Judge Gravely

else that you think needs clarification --

THE COURT: All right. Very briefly. Because, basically, I'm going to have to review all this matter anyway.

MS. RICHBURG: Right. And I understand that, Your Honor. I just want you to see that that's what I eluded to earlier. When I first asked for -- when I first wrote the complaint and the answers to the interrogatories, the first list that was given to me, as I communicated to you before, seven of the members -- seven of the names were not members of the basketball association.

And then Mr. Williams created another list. And I even broke down that list for you, Your Honor, as well. Even in that list, if you will look, that is on the summary.

THE COURT: Okay.

MS. RICHBURG: The challenge.

THE COURT: And I'll look through that.

MS. RICHBURG: Yeah. You will see that there are one, two, three, four, five, six officials where they have not been scheduled. I've never even had a game scheduled with any of those officials. And the last official that is on the list, there was no block for that official because I officiated the game.

THE COURT: All right. Here's what I'm going to do,

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 60, line 1-6,9-15,17-19,22-25; March 20, 2017, Judge Gravely

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I'm going to review all of the information that y'all have provided, including what's in the file. If I need any additional information, I will let you know, both parties, by letter.

Do we have your e-mail address? Do you correspond by e-mail or mail?

MS. RICHBURG: Yes. I -- my e-mail address, I can give it to you.

THE COURT: Well, make sure the clerk has it.

All right. And then in the event -- then otherwise, I -- if I -- any rulings that I have, I will either prepare an order or ask one of the parties to prepare an order, and express that by e-mail. And if we do that, then the only thing you'd need to respond to would be a final order.

MS. RICHBURG: So what would I be receiving?

THE COURT: You'll be getting -- you'll be getting anything via e-mail if I -- either my decision or if I need additional information, I will correspond --

MS. RICHBURG: So your decision -- what decisions are you going to send?

THE COURT: Well, you will -- whatever I -- whatever -- all my communications will come to all parties at the same time by e-mail.

MS. HURLEY: I believe Steve Lopez has communicated

Testimony of Aminah A. Richburg, Transcript of Proceedings, page 61, line 2-5; March 20, 2017, Judge Gravely

with her.

THE COURT: All right. I'm sure the clerk has it.

THE CLERK: I'm going to check just to make sure.

THE COURT: All right. And I will let y'all know as soon as possible. There's a lot of stuff to go through.

**********END OF TRANSCRIPT OF RECORD**********

Appellate Exhibit 1 Sowell SG Gray Letter; page 1-2 List of Falsified Officials and Dates; December 16, 2016; Protective Order

SOWELL GRAY

MICHAEL MONTGOMERY

December 16, 2016

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

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
Date of Loss: 2-2016
IRF Claim No.: 74430
Our File No.: 53-RB1536

Dear Ms. Richburg

I hope you are doing well, and I look forward to seeing you at your deposition on Wednesday, December 21st. I am enclosing a copy of the Protective Order that Judge Verdin entered in this case, as well as a copy of her Order denying your Motion to Dissolve, Terminate, or Cancel Defendant's Motion For a Protective Order. You may have already received them from the Court, but I am sending to you out of an abundance of caution.

Pursuant to the Protective Order that prevents disclosure of this information outside of this lawsuit, enclosed please find a list of officials and schools that have blocked you as of December 16, 2016 (Bates labeled 10-11). Additionally, the dates that the officials' blocks were entered are as follows:

1. Sigmund Arnold: October 8, 2016
2. Jess Davis: August 3, 2016
3. Harry Fay: July 24, 2016
4. Gary Hullinger: November 4, 2015
5. Max Massingale: July 30, 2016
6. Brandi Mills: July 12, 2016
7. Jerry Rackley: August 11, 2016
8. Joseph Richardson: January 2, 2016
9. Tim Sullivan: August 1, 2016
10. Brian Tillotson: July 13, 2016

I'd also like to explain that these names would not necessarily be the ones referenced in Mr. Williams' email of February 5, 2016, as these names have only been entered in the Arbiter system

used to schedule varsity contests. It is my understanding that the ten officials' blocks referenced by Mr. Williams in his email would have come from the Arbiter system used for sub-varsity contests. If any of the officials on Mr. Williams' list are the same as the officials on the SCHSL list, it would be because that official works both varsity and sub-varsity contests and has blocked you for both. Again, there is a different set of partner blocks for varsity contests and for sub-varsity contests. The list provided above would only apply to varsity contests.

With respect to the school blocks, the SCHSL enters blocks for the high school in the attendance area in which the official lives, along with the high school the official attended. Based on your application back in 2013, these blocks for Mauldin High School and Southside High School for varsity basketball contests were entered by Wynne Dee Cockfield at the SCHSL office. Again, this would only apply to varsity contests being assigned by Arbiter, and this information would not necessarily be accessible by Mr. Williams.

Please let me know if you have any additional questions or concerns. With warmest regards, I remain

Very truly yours,

J. Michael Montgomery

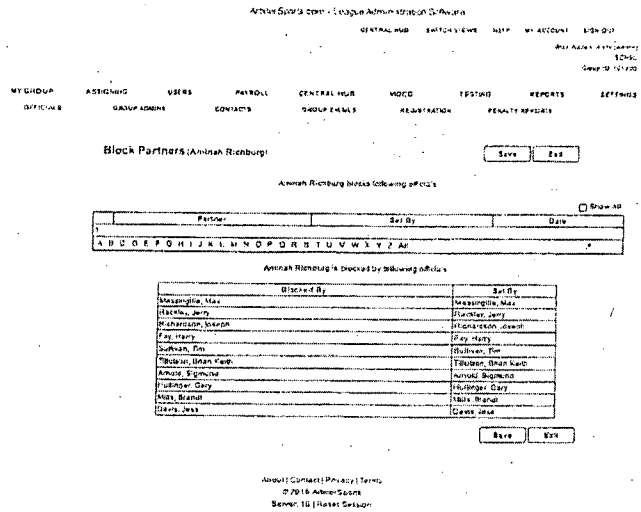
JMM:cmm

Enclosures

cc: Sarah Day Hurley, Esquire

Appellate Exhibit 2 Sports Block Partners Falsified Chart of Officials, No Dates for Blocks; December 16, 2016; Protective Order

---



Block Partners (Amirah Rienburg)

Save | Exit

Amirah Rienburg blocks following officials

Show All

Partner	Set By	Date

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z All

Amirah Rienburg is blocked by following officials

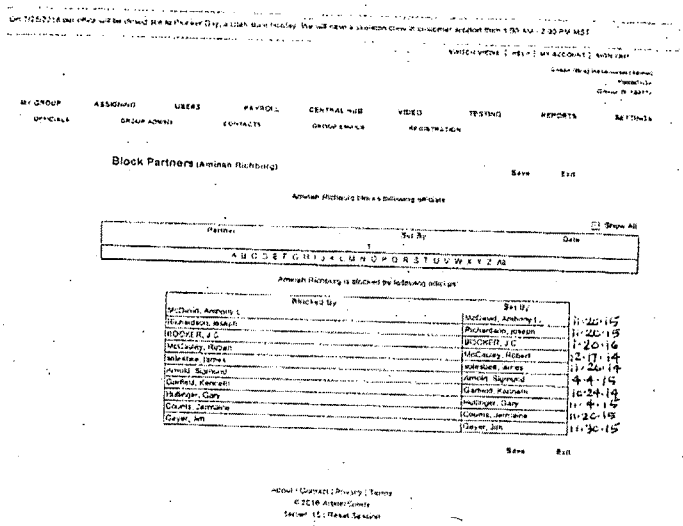
Blocked By	Set By
Meagnolia, Max	Meagnolia, Max
Rackley, Jerry	Rackley, Jerry
Richardson, Joseph	Richardson, Joseph
Fay, Harry	Fay, Harry
Sullivan, Tim	Sullivan, Tim
Tibideri, Brian Kent	Tibideri, Brian Kent
Arnold, Sigmund	Arnold, Sigmund
Hullinger, Gary	Hullinger, Gary
Mills, Brandi	Mills, Brandi
Davis, Jess	Davis, Jess

Save | Exit

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Server: 16 | Reset Session

53481536
Confidential - Subject to Protective Order
Produced by SCHSL
016

Appellate Exhibit 3 Arbiter Sports Blocked Partners Falsified/Altered Chart of Officials, Hand Written Altered/ Falsified Dates, Williams 00038; Protective Order;



Block Partners (Aminah Richburg)

Save Exit

Aminah Richburg has a following affiliate

Partner Set By Date

Show All

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z All

Aminah Richburg is blocked by following officials:

Blocked By	Set By	
McDavid, Anthony L	McDavid, Anthony L	11-25-15
Richardson, Joseph	Richardson, Joseph	11-20-15
HOOKER, J C	HOOKER, J C	1-20-16
McCauley, Hobart	McCauley, Hobart	2-17-14
Valentine, James	Valentine, James	11-26-14
Arnold, Sammuel	Arnold, Sammuel	4-4-15
Canfield, Kenneth	Canfield, Kenneth	10-24-14
Hullinger, Gary	Hullinger, Gary	11-4-14
Counts, Jermaine	Counts, Jermaine	11-26-15
Geyer, Jim	Geyer, Jim	11-30-15

Save Exit

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CONFIDENTIAL

Williams 00038

https://www1.arbitersports.com/Official/BlockingPartners.aspx?userID=3403048 7/25/2016

Appellate Exhibit 4 Arbiter Officials Instructions for Blocks

SWITCH VIEWS HELP MY ACCOUNT SIGN OUT

Assigned Pending (Direct)
SCUOA
Group ID: 107115

MAIN SCHEDULE PAYMENTS BLOCKS LISTS MOBILE REFLOCKER PROFILE

Tasks

Coming soon!

Schedule

Hillcrest vs Riverside
3/24/17 SCHSL Hillcrest HS @ 5:30 PM

Hillcrest vs Riverside
3/24/17 SCHSL Hillcrest HS @ 7:00 PM

Fisher MS vs Greer MS
3/29/17 SCUOA Fisher MS @ 5:30 PM

Eastside vs Clinton
3/31/17 SCHSL Eastside HS @ 6:00 PM

Woodmont JV vs Hillcrest
4/3/17 SCHSL Woodmont HS @ 5:30 PM

Tanglewood MS vs Lakeview MS
4/6/17 SCUOA Tanglewood MS @ 5:30 PM

Wade Hampton (G) vs Riverside
4/7/17 SCHSL Wade Hampton HS (G) @ 5:30 PM

Greenville Academy and Middle School vs Fisher MS
4/17/17 SCUOA East North St. Academy @ 5:30 PM

Tanglewood MS vs Bryson MS
4/18/17 SCUOA Tanglewood MS @ 5:30 PM

Southside vs Carolina Academy
4/21/17 SCUOA Southside HS (Old School) @ 6:00 PM

ArbiterPay

You have no ArbiterPay account

Announcements

Posted By Charles Eaton, 1/15/2017 Sun 4:18 PM

The test will open on 2/1/2017 until 2/28/2017. You must pass this test to call any Varsity games including tournaments. The first tournaments are 2/24/2017 so take them before that date Left click on the words NFHS EXAM SITE below. The link below is for the 2017 NFHS Online Exam Website. There are "site instructions" at the bottom of the page to assist you.

NFHS EXAM SITE

Posted By Charles Eaton, 8/19/2016 Thu 8:49 AM

Do not make yourselves ready. We will do that when you have completed all requirements for certification

Posted By Charles Eaton, 12/5/2011 Mon 5:05 PM

ALL SPORTS EJECTION FORM The online EJECTION FORM is for ALL SPORTS and is to be completed by the official(s) who ejected the player/coach and submitted to the SCHSL as soon as possible following the contest. Coaches are also asked to submit the form. Once the on line form is submitted, there is no need to FAX a copy of the report! Remember to keep a copy of the report for your records!

Posted By Charles Eaton, 12/5/2011 Mon 5:02 PM

Most Volleyball, Baseball and Softball officials' blocks of teams and Partners have been lost Arbiter when we moved to the SC Upstate Officials Association Arbiter. Officials must go back into Arbiter and enter their team and Partner blocks. Please remember to block teams where your children attended/are attending school, where the official attended school or where the official has a relative working at a school where there could be a conflict of interest issue. Officials may block 3 teams for which they do not wish to work or 3 partners with whom they do not wish to work.

Appellate Exhibit 5 Email Message from Respondent Rico Williams to Appellate, October, October 27, 2015

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Records Update

2 messages

ericowms@charter.net <ericowms@charter.net> Tue, Oct 27, 2015 at 6:43 PM
To: "Ericowms@charter.net" <Ericowms@charter.net>, "MRREF12@CHARTER.NET" <MRREF12@charter.net>

After checking our attendance records it has come to my attention that some officials have missed a number of meetings and may be in danger of failing certification. There are several reasons why these meetings may have been missed, and we attempting to update our records along with what the State has on file. Please let me know of your intentions, whether it be to fulfill the obligations of an SCBOA member, or to not officiate as a District 1 member at this time.

Regards,

Rico Williams
Director, District 1
SC Basketball Officials Association

aminah richburg <richburga@bellsouth.net> Sun, Nov 1, 2015 at 8:33 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "ericowms@charter.net" <ericowms@charter.net>

I have attended the SCHL mandatory meeting as well as three district meetings and the meeting change date earlier affected my scheduling. I took my exam early and I should not be accountable for the meeting that was rescheduled.
Aminah Richburg
[Quoted text hidden]

Appellate Exhibit 6 Email Message from Appellate to respondent Rico Williams, November 1, 2015;

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Records Update

2 messages

ericowms@charter.net <ericowms@charter.net> Tue, Oct 27, 2015 at 6:43 PM
To: "Ericowms@charter.net" <Ericowms@charter.net>, "MRREF12@CHARTER.NET" <MRREF12@charter.net>

After checking our attendance records it has come to my attention that some officials have missed a number of meetings and may be in danger of failing certification. There are several reasons why these meetings may have been missed, and we attempting to update our records along with what the State has on file. Please let me know of your intentions, whether it be to fulfill the obligations of an SCBOA member, or to not officiate as a District 1 member at this time.

Regards,

Rico Williams
Director, District 1
SC Basketball Officials Association

aminah richburg <richburga@bellsouth.net> Sun, Nov 1, 2015 at 8:33 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "ericowms@charter.net" <ericowms@charter.net>

I have attended the SCHL mandatory meeting as well as three district meetings and the meeting change date earlier affected my scheduling. I took my exam early and I should not be accountable for the meeting that was rescheduled.
Aminah Richburg
[Quoted text hidden]

Appellate Exhibit 7 Respondent Falsified Spreadsheet of Officials Arrival times and meeting attendance; Williams 00014;

Name	31-Aug-15	14-Sep-15	21-Sep-15	28-Sep-15	5-Oct-15	12-Oct-15	19-Oct-15	26-Oct-15	2-Nov-15	9-Nov-15	11-Jan-15
Double / Single						Mechanic's MTG					Mid-Season Mtg
Crotts, Michael	****			****				****		****	
Edwards, Mack			****			****	****	****	****	****	****
Elmer, Joe	****	****		****	****	****		****	****	****	****
Greer, Gordon	****		****			****			****		
Richburg, Aminah	****		****				****		****		
Wnukowski, Bob	****					****	****	****			

Copied from the Attendance spreadsheet for SCBOA District #1 for 2015/2016 season.

Each Official is marked as in attendance with the **** mark for the dates detailed. Blank Cell indicates Absent for that date.

The cells identified with the Red Triangles in the upper right corner have comments attached to the cell as detailed below:

- Joe Elmer: 21 Sept-SCHSL Volleyball Match Assignment
- Gordon Greer: 31 Aug–Left Early @ 7:00 Personal; 21 Sept-Left Early @ 7:45 Personal; 19 Oct- SCHSL Volleyball Match Assignment
- Aminah Richburg: 21 Sept- Arrived Late to Mtg @ 7:35; 19 Oct- Arrived Late to Mtg @ 7:05.
- Bob Wnukowski: 12 Oct- Left Early @ 7:10 Personal

Kevin N. Brown SCBOA District #1 Secretary/Treasurer

Appellate Exhibit 8 Email Bob Wnukowski, January 1, 2015 to Appellate

---

Re: ArbiterSports.com - List of 'Accept By' dates that have passed.

1 message

aminah richburg <richburga@bellsouth.net> Thu, Jan 1, 2015 at 1:24 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Bob Wnukowski <proump1@netzero.net>

Sorry Bob, I have accepted my games. Happy New Year

On Thursday, January 1, 2015 9:24 AM, Bob Wnukowski <proump1@netzero.net> wrote:

I would appreciate it if you could accept/decline your games as they are past due. I realize that Arbiter fails to send out notices at times and would like to know if this is also the case so that I can inform Arbiter of their problem.
Bob

---------- Forwarded Message ----------
From: "ArbiterSports" <messaging@arbitersports.com>
To: "Robert (Bob) Wnukowski" <proump1@netzero.net>
Subject: ArbiterSports.com - List of 'Accept By' dates that have passed.
Date: 1 Jan 2015 00:16:24 -0500

Below is a list of assignments whose 'accept by' dates have passed.

Group 103774 - Foothills Officials Association (Bob Wnukowski)

Game	Date/Time	Position	Official
13461	1/5/2015 Mon 5:00 PM	Referee	Williams, E.A.
13373	1/5/2015 Mon 5:30 PM	U1	Richburg, Aminah
15278	1/5/2015 Mon 5:30 PM	Referee	Ahart, Harvey
15281	1/5/2015 Mon 5:30 PM	Referee	Sims, Calvin
13464	1/5/2015 Mon 6:15 PM	Referee	Williams, E.A.
15287	1/6/2015 Tue 5:30 PM	U1	Richburg, Aminah
13483	1/6/2015 Tue 5:30 PM	Referee	Sims, Calvin
15289	1/6/2015 Tue 6:00 PM	U1	Ahart, Harvey
15292	1/8/2015 Thu 3:45 PM	U1	Williams, E.A.
13476	1/8/2015 Thu 5:00 PM	U2	Sims, Calvin
13476	1/8/2015 Thu 5:00 PM	U1	Ahart, Harvey
13552	1/8/2015 Thu 5:30 PM	U1	Richburg, Aminah
13470	1/8/2015 Thu 6:15 PM	U2	Sims, Calvin
13470	1/8/2015 Thu 6:15 PM	U1	Ahart, Harvey
15309	1/9/2015 Fri 6:00 PM	Referee	Sims, Calvin
15312	1/9/2015 Fri 6:00 PM	Referee	Ahart, Harvey
15318	1/10/2015 Sat 4:00 PM	Referee	Ahart, Harvey
15319	1/10/2015 Sat 5:00 PM	Referee	Williams, E.A.
15319	1/10/2015 Sat 5:00 PM	U1	Ahart, Harvey

Ready To Be Assigned

Aminah Richburg

Announcements

Posted by Robert (Bob) Wnukowski **1/7/2016 - 4:10 PM**

Basketball Officials, I will be sending out checks for Eastside Girls Christmas Tournament and Upward/Greenville JV's, Greenville Varsity and Travelers Rest Boys Tournament when I get the fees from the schools. The District started a new payment system in December and have slowed some payments. All regular season games should be going out this coming Friday. Please notify me after the mail run on Monday January 11 if you haven't received your check(s). Call your partner first to see if you are the problem or the school if the crew hasn't yet been paid. Don't contact the school yourself. I can also help with varsity checks too. Bob

Posted by Robert (Bob) Wnukowski **12/3/2015 - 2:47 PM**

Basketball Officials, All 2-Person Crews should work the NFHS 2-person mechanics by the book with the exception of the Disqualification Procedure. Please refer to the NFHS Officials Manual for correct procedures and to the District memo for DQ procedures

Posted by Robert (Bob) Wnukowski **12/3/2015 - 2:44 PM**

CANCELLATION OR POSTPONEMENT OF GAMES DUE TO WINTER WEATHER **FIRST: Notify the officials when the contest has been postponed, after you have determined a new date and time, you may ask the officials if they can work the contest. **If you have an official that cannot work a rescheduled game, please contact Bob and he will find a replacement.**If all officials can work a game that has been rescheduled, please contact Bob and give him the new date and time. **Just in case you cannot log into the Arbiter website due to power outages or no access to the school, always keep a copy of your game officials information and phone numbers with you.

Posted by Robert (Bob) Wnukowski **11/10/2014 - 9:42 PM**

HS Basketball Referees that are in District 1 for the first time, Please make sure that your info and calendar are up to date. Since you joined the Foothills last, you should toggle off ALL of your other Groups on your calendar to see if the Foothills calendar is correct. Call me if you have a problem

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HTML Invalid

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Version: 15.1 Build 1603.26

Appellate Exhibit 9 Letter of Termination SCBOA, Dated March 22, 2016

SCBOA District One
South Carolina Basketball Officials Association District One
147 Warrenton Way
Simpsonville, SC 29681

March 22, 2016

Aminah Richburg
217 Plum Creek
Greenville, SC 29607

Dear Aminah,

The SC Basketball Officials Association District One Board of Directors met on February 29th to discuss several issues including your present position within our District. In a February 25th email I invited you to meet with our Board of Directors to discuss any grievances or concerns that you may have. You were not in attendance. In light of your recent communications to me -- the District One Director, and Mr. Joedy Moots, the Officials Association's Representative on the South Carolina High School League's Executive Committee, your discontent and dissatisfaction with the present and future leadership and direction of District One is very apparent. In addition, your denunciation of Mr. Moots's response to your contact further illustrates your displeasure with local and State leadership.

After a vote by the District One Board of Directors, it has been determined that if there is any intent of yours to apply for future membership in District One, your application WILL NOT be accepted. If you have any desires to transfer to another SCBOA District, I will facilitate any communications that are needed. Please note that copies of this email will be sent to the following persons: Mr. Jerome Singleton - Commissioner of the SC High School League, Mr. Skip Lax - Assistant Commissioner of the SC High School League, Mr. Joedy Moots, and the District One Board of Directors.

Regards,

Rico Williams

E.A. "Rico" Williams
Director, District One
SC Basketball Officials Association
864-430-9884
Ericowms@charter.net

Appellate Exhibit 10 SCBOA Tampered, Altered, Falsified Board Meeting minutes; Williams 00017;

ITEMS

- AMINAH RICHBURG
  - WROTE SCBOA OFFICIALS REPRESENTATIVE RESPONSE READ
  - SCBOA OFFICIALS REPRESENTATIVE RESPONSE READ
- REVIEWED DISTRICT FACTS
  - MTG ATTENDANCE
  - GAME ASSIGNMENTS
  - RATINGS FROM OTHER PARTNERS
  - DISTRICT CONTRACT ITEMS

	1ST	2ND
- BOD MTG VOTE		
- SUSPENSION - 3 - 1YR	1	
- PROBATION - 2	0	
- DISMISSAL - 3	(7)	

COMMUNICATION
EMAIL
+
CERTIFIED LETTER

- UPSTATE FINALS
  - FOOD BILL REVIEWED
    - BILL = $2272.65

REVIEWED ? APPROVED

- SOCIAL
  AL - LOCAL QUE - 6
  DAVE - BAILEYS - 0
  - DAVE & BUSTER'S - 2

  LOCAL QUE - 3/7/16
  - $$$ - TREASULER TO HANDLE
  - INVITE - D. NANCE
  - SKIP
  - TONI - CC COACH
  - BOD MEMBERS TO GET

-

- AWARDS
  R-0-4
  - SEAN GAFFNEY - 7 vs 1 (+1 = 8)

  JV-0-4
  *J. GEIER - 6 + S. LAWRENCE = 7
  - C. WORKMAN - 3

PRESENT
RW ✓
DD ✓
KP ✓
JM ✓
AB ✓
SL ✓
BW ✓
GH ✓
KB ✓

WILLIAMS
00017

Appellate Exhibit 11 YBOA Membership Emails; March 2, 2016-March 11, 2016

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

YBOA 2016 schedule

1 message

Mark A. Turner <mdmmturn@ftc-i.net> Wed, Mar 2, 2016 at 4:53 PM
To: Mark Turner <mdmmturn@ftc-i.net>

Fellow Officials,

I want to extend this invitation out to you in regards to me joining my old organization YBOA. I still plan on working for the Basketball of the Carolinas but just in case there is no tournament schedule for one then we can try and work the other. I you to go register on the YBOA web-site and make sure you register as a coach please. If you run into any issues please call the corporate office I really cannot do anything about it.

Google: scyboa

Mark A. Turner

Doing things other will not touch!

----- Original Message -----
From:
"Tenacious" <dmtenacious7@aol.com>

To:
tsmalls86@hotmail.com, talbim@yahoo.com, immaworldovercomer@yahoo.com, srevirj@aol.com, robertfields.24@hotmail.com, mdmmturn@ftc-i.net, luciuslevett1@bellsouth.net, lsnype2323@gmail.com, jgarrett410@gmail.com, gramore005@gmail.com, frmdi92@gmail.com, dahazh@yahoo.com, chubdat@aol.com, backandcallsolutions@aol.com, alfonso.rogers84@gmail.com, gocpr123@gmail.com, tsteed2010@yahoo.com, emergency45@hotmail.com, josephjr23@msn.com, kindrickross@yahoo.com, friedig@gmail.com, Sj-187@aol.com, artgadd@comcast.net, frances.fields13@gmail.com
Cc:
"melvaree witherspoon" <sistahref@gmail.com>
Sent:
Wed, 02 Mar 2016 11:29:57 -0500
Subject:
Re: YBOA 2016 schedule
Officials,
Please register as a Coach when registering online....

Thanks,
Deitrick

Sent from my Verizon Wireless 4G LTE DROID

Deitrick <dmtenacious7@aol.com> wrote:

Morning Officials,
Please go to the link below and register in order to officiate summer YBOA/AAU basketball. This is **Protocol not Our call**, therefore if you don't register we can't assign you any games.

Please send proof of your registration to me upon completion.

Humbly yours,
Deitrick

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

YBOA

2 messages

Mark A. Turner <mdmmtum@ftc-i.net> Fri, Mar 11, 2016 at 10:42 AM
To: Sam Winn Galloway <Samawinn@gmail.com>, Aminah Richburg <richburga@bellsouth.net>, Cassandra Turner <casturn50@gmail.com>
Cc: Dietrich Middleton <dmtenacious7@aol.com>

Officials,

Please read the message below I would love for you to register on the YBOA web-site. You can Google SC YBOA and make this happen please, you cannot call games without. After registration please send your number to Dietrich Middleton, check the CC box for her information.

Mark I would like to recruit a few more solid females also.

Please register as a Coach when registering online....

Thanks,
Deitrick

Mark A. Turner

Doing things other will not touch!

---

aminah richburg <richburga@bellsouth.net> Fri, Mar 11, 2016 at 11:22 AM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "Mark A. Turner" <mdmmtum@ftc-i.net>

Aminah Richburg - Registered - Coach ID#388478

[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

YBOA Officials

4 messages

Tenacious <dmtenacious7@aol.com> Fri, Mar 11, 2016 at 12:54 PM
To: richburga@bellsouth.net
Cc: melvaree witherspoon <sistahref@gmail.com>

Hi Amina,
This is Deitrick of Charleston Whistleblowers Basketball Officials. Please forward your verification of registration to me ASAP to forward to the Director & for our files.

Welcome to our organization and we look forward to meeting you.

Deitrick & Melvaree

---

aminah richburg <richburga@bellsouth.net> Fri, Mar 11, 2016 at 1:49 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Tenacious <dmtenacious7@aol.com>

This is all that I have, I look forward to working with you as well.
Aminah Richburg
864-419-6707
217 Plum Creek Lane
Greenville, SC 29607
[Quoted text hidden]

YBOA Aminah.pdf
463K

Tenacious <dmtenacious7@aol.com> Fri, Mar 11, 2016 at 6:09 PM
To: aminah richburg <richburga@bellsouth.net>

Awesome that's what I need!!!
Deitrick

Sent from my Verizon Wireless 4G LTE DROID
[Quoted text hidden]

YBOA Aminah.pdf
463K

Deitrick <dmtenacious7@aol.com> Wed, Mar 16, 2016 at 9:51 PM
To: richburga@bellsouth.net

Good Evening Aminah,

After a lengthy discussion and insight from YBOA organizers, we are unable to schedule you any assignments through Charleston Whistleblowers Basketball Officials.

We apologize for any inconvenience, however feel free to contact the National Headquarters at 407-363-9262 and request a refund.

Sincerely,
Deitrick & Melvaree

Appellate Exhibit 12 Tony McDavid; YBOA Member, Tony McDavid SCBOA District One Member Solicitation, February 12, 2016;

—Original Message—
From: sistahref <sistahref@comcast.net>
To: Middleton, Deitrick <dmtenacious7@aol.com>
Sent: Tue, Mar 1, 2016 8:59 pm
Subject: Fwd: YBOA 2016 schedule

scyboa.com

From: "Tony McDavid" <TMcDavid@greenvillecounty.org>
To: "Tony McDavid" <TMcDavid@greenvillecounty.org>
Sent: Friday, February 12, 2016 11:03:17 AM
Subject: YBOA 2016 schedule

Good morning Collegues,

Hopefully everyone is having a good high school season. I am sending Out the 2016 YBOA schedule for the spring / summer. I will need everyone to go to the scyboa.org Site and register, the cost is $15.00.

cid:image001.jpg@01CFFE7A.2FD1FD70

SCBOA District 1 Member

TONY MCDAVID
E-9-1-1 TECH SUPPORT
OFF: (864) 467-5910
FAX: (864) 467-5918
EMAIL: tmcdavid@greenvillecounty.org

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SHERIFF'S OFFICE image001.jpg 5K

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Aminah Richburg

1 message

aminah richburg <richburga@bellsouth.net> Thu, Mar 24, 2016 at 12:24 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: tmcdavid@greenvillecounty.org

Tony McDavid,
Could you please communicate the lengthly discussion and insight from YBOA organizers had on my behalf, that my association was rejected after I recieved such a warm welcome from the organization five days prior.

Appellate Exhibit 13 Emails Mark Turner January 18, 2016; Listing of Tournaments for the 2016 Season for YBOA;

Hoops of Dreams Invitational
March 12-13
Greenville SC

Journey to the Tourney
March 18-20
Greenville SC

Chad Cooke Memorial Cavalier Classics
March 25-26
Charleston SC

Battle of the Border
April 1-3
Greenville SC

Carolina Crusader Classics
April 8-10
Greenville SC

Greater Greenville Invitational
April 15-17
Greenville SC

SC Boys & Girls Upper State Qualifier
April 22-24
Greenville SC

2nd Annual Curtis Harkness Invitational
April 29-May 1
Greenville SC

Palmetto State Classic
May 6-7
Grenville SC

SC Boys & Girls 2nd Chance State Qualifier
May 13-15
Greenville SC

G-Vegas Showdown
June 25-26
Greenville SC

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Basketball Tournaments

2 messages

Mark A. Turner <mdmmturn@ftc-i.net>
To: mdmmturn@ftc-i.net

Wed, Dec 30, 2015 at 2:02 PM

Fellow Officials,

I am in the mist of planning for basketball tournaments starting in either late February or early March. What I need for each of you is your availability once I confirm tournament dates. Most of all if you commit to these tournaments you will need to show up as my name will be on the line.

Here are some of the locations that I am looking at:

Greenville SC

Anderson SC

Clemson SC

Charleston SC

Parts of NC

I will contact the director of the tournaments in the middle of next month to stake my claim for tournaments dates.

V/R

MARK & DEMETRA TURNER

" ALWAYS PRAY, PRAYER CHANGES ALL THINGS"

---

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "Mark A. Turner" <mdmmturn@ftc-i.net>

Sun, Jan 3, 2016 at 2:14 PM

I am available for tournaments in February and March, cannot view the attachment.

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

FYI

2 messages

Mark A. Turner <mdmmturn@ftc-i.net>
To: Mark Turner <mdmmturn@ftc-i.net>

Wed, Feb 10, 2016 at 9:10 AM

Good Morning,

I hope you had a wonderful basketball season and made progress to becoming a better official. I been researching basketball tidbits on the internet and wanted to provide you with some tools going forward. If you have anything that you would like to share please send it to me or a story of a game you had.

Please read this material it is in no shape or form am I trying to tell how to officiate or communicate. The more I understood some of the values that this information provided me the better I think I was prepared for anything during the game.

Last, if you have not build you a folder with valuable officiating information now is the time to do it cause when all else fails you have something to fall back on...

Thanks in advance

Mark A. Turner

Doing things other will not touch!

4 attachments

BBPregame.pdf
136K

Good Communication between Basketball Officials and Coaches Is Key.docx
15K

Referee Communication Checklist.docx
17K

Basketball Signal Chart-New.pdf
616K

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "Mark A. Turner" <mdmmturn@ftc-i.net>

Wed, Feb 10, 2016 at 9:26 AM

Good Material Thanks!!!!!!
Aminah

[Quoted text hidden]

Appellate Exhibit 14 Appellate Listing of SCBOA District One Officials 2013-2016

2013-2014 Official Names District I	Years of Experience	2014-2015 Official Names District I	Years of Experience	2015-2016 Official Names District I	Years of Experience NOT PROVIDED
LINDER, TIM T.	18	DENDY, DAVID	29	AHART, HARVEY JR	
WARD, DONALD C.	16	BROWN, KEVIN	15	ALLISON, DAVID KENNEDY	
ELMER, JOSEPH N.	21	LINDER, TIM T.	20	ARNOLD, SIGMUND	
COURTRIGHT, SCOTTY	39	PELANDA, KEN B.	14	BANISTER, WILLIAM	
BROWN,KEVIN	14	CHAPPELL, DOUG B.	14	BATSON, DREUGH	
PELANDA, KEN B.	13	NORRIS, JENNIFER	29	BLACK, PAUL	
BROWN, FRANKIE	9	COURTRIGHT, SCOTTY	40	BLACK, ROBERT	
CHAPPELL, DOUG B.	13	HULLINGER, GARY	16	BLUE, TRAVIS	
RODRIGUEZ, HECTOR	14	CARAWAY, JOHN B. JR.	15	BOOKER, J.C.	
DENDY, DAVID	27	WILLIAMS, E.A. "RICO"	20	BRITT, THOMAS	
CARAWAY, JOHN	14	MCGREGOR, BENNY W.	19	BROWN, KEVIN	
WESTFIELD, EVERETTE	20	ELMER, JOSEPH N.	22	BRYSON, JOHN	
HULLINGER,GARY	13	WNUKOWSKI, BOB	23	CARAWAY, BYRON	
WILLIAMS, E.A. "RICO"	18	KIRK, DAVID	15	CHAPPELL, DOUG	
CARR, TOM	10	CRAIG, JAMES K.	13	CLIKSCALE, BERNARD	
NORRIS, JENNIFER R.	19	GREER, GORDON K.	12	COOLEY, TAMARA	
MCGREGOR, BENNY W.	18	MCCAULEY, BOB	7	COUNTS, JERMAINE	
BANISTER, W. A "AL"	29	WARD, DONALD C.	18	COX, AUDREY	
BATSON, DREUGH H.	28	LAWERENCE, STEWARD	7	CRAIG, JAMES	
MCALISTER, L.T. "LANNY"	13	BANISTER, W.A. "AL"	30	CROTTS, MICHAEL	
BLACK, PAUL E.	16	BROWN, FRANKIE	9	DENDY, DAVID	
THOMASON, JOE D.	23	MEEKINS, JAMES W.	23	EDENS, CHARLES	
MACMILLAN, DOUG	6	MACMILLAN, DOUG	7	EDWARDS, WILLIAM	
GREER, GORDON	11	CROTTS, MICHAEL	10	ELMER, JOESPH	
KIRK, DAVID	14	RODRIGUEZ, HECTOR	15	FAY, HARRY	
MEEKINS, JAMES W.	22	COX, AUDREY L.	11	GAFFNEY, SEAN	
LAFOY, RANDY	33	MARTIN, DANIEL L.	21	GARFIELD, KENNETH	
CRAIG, JAMES	12	HOLTZ, THOMAS D.	16	GEYER, JIM	
CROTTS, MICHAEL	9	GARFIELD, KEN	6	GGODLET, DANIEL	
BARKSDALE, ANDREW	7	ALLISON, DAVID	6	GREER, GORDON	
COX, AUDREY L.	10	BROWN, STEVE	11	GRISSET, LAMONT	
MCCAULEY, BOB	6	MCDAVID, ANTHONY	14	HARDEN, ALLAN	
EDENS, CHARLES A.	9	BATSON, DREUGH H.	29	HARRIS, JONATHAN (JOHN W	
LAWERENCE, STEWARD	6	RATTEREE, JAY	5	HAYWOOD, KIMBERLY	
BARRON, BRAD	9	EDWARDS, W. MACK	39	HENDRICKS, CHADWICK	
EDWARDS, W. MACK	43	AHART, HARVEY	7	HOLTZ, THOMAS	
BRYSON, JOHN W.	8	LAFOY, RANDY	37	HULLINGER, GARY EUGENE	
MUHAMMAD, LATEEF S.	7	FAY, HARRY	7	JACQUES, FRANKLIN DENNIS	
MCDAVID, ANTHONY L.	13	BRYSON, JOHN W.	9	JONES, JAKIA KESHON	
MARTIN, DANIEL L.	20	ARNOLD, SIGMUND	6	KINZER, ANDREW	
HAYWOOD, KIMBERLY W.	18	EDENS, CHARLES	10	KIRK, DAVID C.	
ALLISON, DAVID	5	MUHAMMAD, LATEEF S.	8	LAFOY, RANDY	
GARFIELD, KEN	5	BOOKER, J.C.	7	LAWRENCE, STEWARD	
ARNOLD, SIGMUND	5	HARDEN, ALLAN	5	LINDER, TIM	
BOOKER, JC	6	BONADIO, WES	6	MACMILLAN, DOUG	
SOLESBEE, JIM	5	SOLESBEE, JIM	6	MANGRUM, AUBREY	
WILLIAMS, LARRY E.	17	BATES, FRED	16	MANGRUM, ROBERT JR.	
WATSON, GREGORY	7	GEYER, JIM	5	MARTIN, DANIEL	
FAY, HARRY	6	WILLIAMS, JOHN	5	MARTIN, RAY	
RATTEREE, JAY	4	SIMS, CALVIN	5	MCCAULEY, ROBERT JR	
HARDEN, ALLAN	4	WILLIAMS, LARRY	1	MCDAVID, ANTHONY	
GEYER, JIM D.	4	MARTIN, RAY L.	4	MCGREGOR, BENNY	
WILLIAMS, JOHN	4	MANGRUM, ROBERT E. JR.	4	MEEKINS, JAMES, W	
HOLTZ, THOMAS	3	SLOAN, T.R.	3	MISZTAL, BOBBY	
WELLS, ANTHONY D.	3	WILLIS, TAMMY D.	3	MUHAMMAD, LATEEF	
MANGRUM, ROBERT E. JR.	3	BENNETT, JOSEPH	3	MURCHISON, JASON	
MARTIN, RAY L.	3	HENDRICK, CHADWICK F.	3	NORRIS, JENNIFER	
SLOAN, T.R.	2	O'CONNELL, SEAN A.	1	O'CONNELL, SEAN A.	
CHILDRESS,JERRY	3	MAZZOLI, ROBERT	1	PELANDA, KEN	
COUNTS, JERMAINE	2	GRISSETT, LAMONT	1	RAMSEY, MICHAEL	
WILLIAMS, JONATHAN E.	2	SNYDER, KENDRA	1	RATTERREE, JAY	
WILLIS, TAMMY	2	COOLEY, TAMARA	1	RICHARDSON, JOSEPH	
HENDRICK, CHADWICK F.	2	CALHOUN, NATASHIU	1	RICHBURG, AMINAH	
RAMSEY, MICHAEL	2	RICHBURG, AMINAH	2	ROBINSON, EDWARD MILTON	
TERRY, RODERICK K.	1			RODRIQUEZ, HECTOR	
HARRIS, NASHUN L.	1			SIMS, CALVIN	
HOUSTON, MICHAEL	1			SLOAN T.R. JR.	
O'CONNELL, SEAN A.	1			SNYDER, KENDRA JANELLE	
BENNETT, BYRON W.	1			SOLESBEE, JAMES	
RICHBURG, AMINAH	1			VICK, DONNIE RAY	
				WARD, DONALD CLEVELAND	
				WALTER, TIMOTHY C	
				WILLIAMS, CAL	
				WILLIAMS, E.A.	
				WILLIAMS, JOHN	
				WNUKOWSKI, ROBERT (BOB) C.	
				WORKMAN, GERARD ANTHONY	

Appellate Exhibit 15 Appellate Chart Breakdown of Protective Order Officials/ Blocks/ Official Ballgames with Appellate

SCHSL OFFICIALS THAT BLOCKED THE PLAINTIFF (SCHSL- CONFIDENTIAL-SUBJECT PROTECTIVE ORDER – 010) Officials are not members of the SCBOA highlighted.	BASKETBALLGAMES/PLAINTIFF	SCRIMMAGES WITH PLAINTIFF	DATE OF BLOCKS
OFFICIAL 1	NONE		
OFFICIAL 2	NONE		
OFFICIAL 3	(2) 12/11/14 , 1/30/15		11/20/15
OFFICIAL 4	NONE		
OFFICIAL 5	NONE		
OFFICIAL 6	NONE		
OFFICIAL 7	2/2/15		4/4/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE		
OFFICIAL 10	NONE		

TEN OFFICIALS PROVIDED BY E.A. RICO WILLIAMS (WILLIAMS 00038)	OFFICIAL BASKETBALL GAMES WITH PLAINTIFF (NUMBER OF GAMES) –DATES Highlighted officials have never been scheduled for a game with the Plaintiff. The Plaintiff is unfamiliar with the officials less than 1% interaction with Plaintiff.	SCRIMMAGES/ EIGHT OR MORE OFFICIALS IN AND OUT FOR QUARTERS NO PAY FOR CERTIFICATION BEFORE THE BASKETBALL SEASON – (DATE)	ALLEGED BLOCK HAND WRITTEN IN BY DEFENDANT – E.A. RICO WILLIAMS – CREATED AND UNPROFESSIONAL – OBJECTIONABLE BY AFFIDAVIT (DATE) PRESENTED BY DEFENDANT – E.A. RICO WILLIAMS
OFFICIAL 1	NONE	11/20/14	11/20/15
OFFICIAL 2	(2) 12/11/14, 1/30/15		11/20/15
OFFICIAL 3	(2) 1/13/14, 1/6/15		1/20/16
OFFICIAL 4	NONE		12/17/14
OFFICIAL 5	NONE	6/23/14	11/26/14
OFFICIAL 6	2/2/15		4/4/15
OFFICIAL 7	NONE	10/24/14	11/12/15
OFFICIAL 8	1/5/15		11/4/15
OFFICIAL 9	NONE	11/19/15	11/20/15
OFFICIAL 10	(2) 12/10/13 , 12/3/15	6/24/14 , 6/26/14	11/30/15 Game Scheduled no Block

Appellate Exhibit 16 Appellate Chart Breakdown of Officials that worked Basketball Scrimmages with Appellate

APPELLATE SCRIMMAGES – HIGH SCHOOL VARSITY GAMES/JUNIOR VARSITY GAMES – ROTATE QUARTERS WITH OTHER OFFICIALS – THE PLAINTIFF VOLUNTEERED TO OFFICIATE SCRIMMAGES DURING THE SUMMER BECAUSE SHE OFFICIATES FOOTBALL AND VOLLEYBALL DURING THE FALL.		
2013-14 SEASON – SCHSL-RECORDS NOT PROVIDED SCHSL COMMUNICATED THE RECORDS ARE LOST – 1ST YEAR	2014-2015 SEASON -2ND YEAR	2015-2016 SEASON 3RD. YEAR
	AHART, HARVEY JR. - SUMMER	CARAWAY, BYRON
	BENNETT, JOSEPH - SUMMER	COUNTS, JERMAINE
	COX, AUDREY - SUMMER	COX, AUDREY
	DENDY, DAVID - SUMMER	GARFIELD, KENNETH
	EDENS, CHARLES	GEYER, JIM
	GEYER, JIM - SUMMER	KIRK, DAVID (2)
	GOODLETT, DANIEL - SUMMER	LAWRENCE, STEWART
	GREER, GORDON	MANGRUM, ROBERT - SUMMER
	GRISSETT, LAMONT - SUMMER	MURCHISON, JASON - SUMMER
	HARRIS, JOHNATHAN	PELANDA, KEN - SUMMER
	KIRK, DAVID	RATTERREE, JAY
	MCDAVID, ANTHONY	WILLIAMS, CAL - SUMMER
	MUHAMMAD, LATEEF	WILLIAMS, E.A.
	O'CONNELL, SEAN	WILLIAMS, JOHN
	PELANDA, KEN - SUMMER	
	SOLESBEE, JAMES - SUMMER	
	WILLIAMS, E.A. - SUMMER	
	WILLIAMS, JOHN	
	WNUKOWSKI, ROBERT - SUMMER	

Appellate Exhibit 17 Appellate Chart Breakdown of Officials that worked Middle and Junior Varsity Games with Appellate

APPELLATE PAID GAMES SCHSL –OFFICIALS THAT WORKED WITH PLAINTIFF – MIDDLE SCHOOL / JUNIOR VARSITY		
2013-2014 Season – 1ST YEAR	2014-2015 Season - 2ND YEAR	2015-2016 Season – 3RD YEAR
BRYSON, JOHN – Game Canceled	ALLISON, DAVID	BANISTER, WILLIAM
COX, AUDREY (2 Games)	ARNOLD, SIGMUND	BLACK, PAUL
EDENS, CHARLES (3 Games)	BOOKER, J.C.	BOOKER, J.C.
ELMER, JOSEPH – Game Canceled	CARAWAY, BYRON	CLINKSCALE, STANLEY
GEYER, JIM (2 Games)	CRAIG, JAMES	CROTTS, MICHAEL (2 Games)
GORDON, GREER	EDENS, CHARLES (2 Games)	EDWARDS, WILLIAM MACK
HARDEN, ALLAN	ELMER, JOSEPH	GEYER, JIM
JAY RATTERREE	GREER, GORDON	HARDEN, ALLAN
MUHAMMAD, LATEEF (2 Games)	HULLINGER, GARY	HENDRICKS, CHADWICK
WILLIAMS, JOHN	JACKSON, JOHN	HOLTZ, THOMAS (2 Games)
	LAWERENCE, STEWARD	
	MARTIN, RAY	MUHAMMAD, LATEEF
	MUHAMMAD, LATEEF	VICK, DONNIE
	RATTERREE, JAY	WILLIAMS, JOHN (2 Games)
	RICHARDSON, JOSEPH (2 Games)	
	WILLIAMS, JOHN	

Appellate Exhibit 18 Appellate Chart Breakdown of Officials with games and scrimmages with the Appellate;

OFFICIALS ASSIGNED GAMES WITH THE APPELLATE FROM 2013-2016	
1	AHART, HARVEY JR.
2	ALLISON, DAVID
3	ARNOLD, SIGMUND
4	BANISTER, WILLIAM
5	BENNETT, JOSEPH
6	BLACK, PAUL
7	BOOKER, J.C.
8	BRYSON, JOHN
9	CARAWAY, BYRON
10	CLINKSCALE, STANLEY
11	COUNTS, JERMAINE
12	COX, AUDREY
13	CRAIG, JAMES
14	CROTTS, MICHAEL
15	DENDY, DAVID
16	EDENS, CHARLES
17	EDWARDS, WILLIAM MACK
18	ELMER, JOSEPH
19	GARFIELD, KENNETH
20	GEYER, JIM
21	GOODLETT, DANIEL
22	GORDON, GREER
23	GREER, GORDON
24	GRISSETT, LAMONT
25	HARDEN, ALLAN
26	HARRIS, JOHNATHAN
27	HENDRICKS, CHADWICK
28	HOLTZ, THOMAS
29	HULLINGER, GARY
30	JACKSON, JOHN
31	JAY RATTERREE
32	KIRK, DAVID
33	LAWERENCE, STEWARD
34	MANGRUM, ROBERT
35	MARTIN, RAY
36	MCDAVID, ANTHONY
37	MUHAMMAD, LATEEF
38	MURCHISON, JASON
39	O'CONNELL, SEAN
40	PELANDA, KEN
41	RATTERREE, JAY
42	RICHARDSON, JOSEPH
43	SOLESBEE, JAMES
44	VICK, DONNIE
45	WILLIAMS, CAL
46	WILLIAMS, E.A.
47	WILLIAMS, JOHN
48	WNUKOWSKI, ROBERT

Appellate Exhibit 19 Appellate Official game Schedule from 2013-2016; Williams 00022-00032;

Assignor Bob Wnukowski
864-509-0625 or 864-901-4733
proump1@netzero.net

Official's Game Schedule

Aminah Richburg
217 Plum Creek
Greenville, SC 29607

C: 864-419-6707

Game	Date & Time	Sport & Level	Site	Home	Away
12641	12/5/2013 (Thu) 5:30 PM	Basketball MS Girls and Boys	Ralph Chandler MS	Ralph Chandler MS	League Academy
Referee	Allan Harden 8		C: 864-884-2981		Accepted
U1	Aminah Richburg 11				$52.90
12349	12/10/2013 (Tue) 4:00 PM	Basketball MS Girls and Boys	Shannon Forest Christian School	Shannon Forest CS	Greenville Hurricanes
Referee	Jim Geyer 6		C: 865-388-0385		Accepted
U1	Aminah Richburg 7				$52.00
12171	12/12/2013 (Thu) 4:30 PM	Basketball JV Boys	Brashier Middle College	Brashier Middle College	Dixie HS
Referee	Jay Ratterree 19		C: 864-884-0356	W: 864-451-5222	Accepted
U1	Aminah Richburg 11				$43.90
[11/30/2013 10:08 PM by Robert (Bob) Wnukowski] - Higher rated official must stay until entire varsity crew is on site.					
12298	12/16/2013 (Mon) 5:30 PM	Basketball MS Girls and Boys	Sevier MS	Sevier MS	Northwest MS
Referee	lateef muhammad 17		C: 864-363-5511		Accepted
U1	Aminah Richburg 13				$54.70
12108	12/19/2013 (Thu) 5:30 PM	Basketball MS Girls and Boys	Lakeview MS	Lakeview MS	League Academy
Referee	Audrey Cox 11		C: 864-704-6799		Accepted
U1	Aminah Richburg 13				$54.70
12805	1/6/2014 (Mon) 5:30 PM	Basketball MS Girls and Boys	League Academy	League Academy	Northwest MS
Referee	_____				
U1	Aminah Richburg 13				$54.70

WILLIAMS
00022

Game	Date & Time	Sport & Level	Site	Home	Away
12781	1/7/2014 (Tue) 5:30 PM	Basketball MS Girls and Boys	Beck Academy at new site	Beck MS and Academy	Christ Church ES
Referee	Audrey Cox 19		C: 864-704-6799		Accepted
U1	Aminah Richburg 0				$52.00
12742	1/9/2014 (Thu) 4:00 PM	Basketball MS Girls and Boys	Pleasant Grove BC - Greer	Greenville Hurricanes	Spartanburg Charter
Referee	Gordon Greer 14		H: 864-244-9152	C: 864-607-1042	Accepted
U1	Aminah Richburg 11				$52.90
12173	1/10/2014 (Fri) 5:00 PM	Basketball JV Boys	Brashier Middle College	Brashier Middle College	Greenville Tech Charter HS
Referee	lateef muhammad 12		C: 864-363-5511		Accepted
U1	Aminah Richburg 11				$43.90
12109	1/13/2014 (Mon) 5:30 PM	Basketball MS Girls and Boys	League Academy	League Academy	Tanglewood MS
Referee	J C BOOKER 17		C: 864-230-9257	C: 864-436-1609	Accepted
U1	Aminah Richburg 13				$54.70
12859	1/14/2014 (Tue) 4:00 PM	Basketball MS Boys	Welcome Baptist Church	Easley Home School	Asheville Trailblazers
Referee	Charles A. Edens 8		H: 864-299-5355	C: 864-884-5610	Accepted
U1	Aminah Richburg 10				$60.00
12860	1/14/2014 (Tue) 5:00 PM	Basketball JV Boys	Welcome Baptist Church	Easley Home School	Asheville Trailblazers
Referee	Charles A. Edens 0		H: 864-299-5355	C: 864-884-5610	Accepted
U1	Aminah Richburg 0				$0.00
12536	1/21/2014 (Tue) 6:00 PM	Basketball JV Girls and Boys	Southside Christian School	Southside Christian HS	Christ Church ES
Referee	_____				
U1	Aminah Richburg 9				$60.00
12269	1/23/2014 (Thu) 5:30 PM	Basketball MS Girls and Boys	Mauldin MS	Mauldin MS	Ralph Chandler MS
Referee	Charles A. Edens 10		H: 864-299-5355	C: 864-884-5610	Accepted
U1	Aminah Richburg 9				$52.00
12864	1/27/2014 (Mon) 4:00 PM	Basketball JV Boys	Welcome Baptist Church	Easley Home School	Fountain Inn Christian
Referee	John Williams 22		C: 864-787-4583		Accepted
U1	Aminah Richburg 10				$43.00

WILLIAMS
00023

Game	Date & Time	Sport & Level	Site	Home	Away
12354	1/28/2014 (Tue) 4:00 PM	Basketball MS Girls and Boys	Shannon Forest Christian School	Shannon Forest CS	Langston Charter
Referee	Jim Geyer	0	C: 865-388-0385		Accepted
U1	Aminah Richburg	0			$9.00
*** This game has been CANCELED. ***					
12935	1/29/2014 (Wed) 4:00 PM	Basketball MS Boys	Shannon Forest Christian School	Shannon Forest CS	St Mary's CS
Referee	Jim Geyer	0	C: 865-388-0385		Accepted
U1	Aminah Richburg	0			$9.00
*** This game has been SUSPENDED. ***					
12264	1/31/2014 (Fri) 5:30 PM	Basketball MS Girls and Boys	Greenville Middle	Greenville MS	Blue Ridge MS
Referee	John Bryson	6	C: 864-419-6343		Accepted
U1	Aminah Richburg	0			$52.00
12177	2/11/2014 (Tue) 5:00 PM	Basketball JV Boys	Brashier Middle College	Brashier Middle College	St Joseph's CS
Referee	Joseph Elmer	0	H: 864-268-0242		Accepted
U1	Aminah Richburg	0			$9.00
*** This game has been SUSPENDED. ***					
13082	6/23/2014 (Mon) 7:00 PM	Basketball JV Boys Scrimmage	Travelers Rest HS (new)	Wade Hampton HS	Greenville HS
Referee	james solesbee	21	C: 864-449-0227	W: 864-271-7111	Accepted
U1	Aminah Richburg	21			$18.90
U2	Lamont Grissett	23	C: 864-901-7252		Accepted
Observer	Ken Pelanda	0	C: 864-525-3830	H: 864-297-4190	Accepted
13083	6/23/2014 (Mon) 8:00 PM	Basketball JV Boys Scrimmage	Travelers Rest HS (new)	Woodmont HS	Wade Hampton HS
Referee	james solesbee	0	C: 864-449-0227	W: 864-271-7111	Accepted
U1	Aminah Richburg	0			$0.00
U2	Lamont Grissett	0	C: 864-901-7252		Accepted
Observer	Ken Pelanda	0	C: 864-525-3830	H: 864-297-4190	Accepted

Game	Date & Time	Sport & Level	Site	Home	Away
13084	**6/24/2014 (Tue) 5:00 PM**	**Basketball JV Boys Scrimmage**	**Travelers Rest HS (new)**	**Greenville HS**	**Woodmont HS**
Referee	Jim Geyer	21	C: 865-388-0385		Accepted
U1	Joseph Bennett	35	C: 864-314-2798		Accepted
U1	**David Dendy**	20	C: 864-331-9551	W: 864-397-3204	Accepted
U2	Aminah Richburg	21			**$18.90**
U2	Harvey Jr Ahart	16	C: 864-567-0472		Accepted
U3	E.A. Williams	12	C: 864-430-9884	C: 864-294-0857	Accepted
Observer	Audrey Cox	7	C: 864-704-6799		Accepted
13085	**6/24/2014 (Tue) 6:00 PM**	**Basketball JV Boys Scrimmage**	**Travelers Rest HS (new)**	**Travelers Rest HS**	**Woodmont HS**
Referee	Jim Geyer	0	C: 865-388-0385		Accepted
U1	Joseph Bennett	0	C: 864-314-2798		Accepted
U1	**David Dendy**	0	C: 864-331-9551	W: 864-397-3204	Accepted
U2	Aminah Richburg	0			**$0.00**
U2	Harvey Jr Ahart	0	C: 864-567-0472		Accepted
Observer	Audrey Cox	0	C: 864-704-6799		Accepted
13092	**6/26/2014 (Thu) 5:00 PM**	**Basketball JV Boys Scrimmage**	**Travelers Rest HS (new)**	**Woodmont HS**	**Travelers Rest HS**
Referee	Jim Geyer	21	C: 865-388-0385		Accepted
U1	Daniel Goodlett	16	C: 864-275-5395		Accepted
U2	_____				
U2	Aminah Richburg	21			**$18.90**
Observer	**Robert (Bob) Wnukowski**	27	C: 864-901-4733	H: 864-509-0625	Accepted
13093	**6/26/2014 (Thu) 6:00 PM**	**Basketball JV Boys Scrimmage**	**Travelers Rest HS (new)**	**Wade Hampton HS**	**Woodmont HS**
Referee	Jim Geyer	0	C: 865-388-0385		Accepted
U1	Daniel Goodlett	0	C: 864-275-5395		Accepted
U2	_____				
U2	Aminah Richburg	0			**$0.00**
Observer	**Robert (Bob) Wnukowski**	0	C: 864-901-4733	H: 864-509-0625	Accepted
13094	**6/26/2014 (Thu) 7:00 PM**	**Basketball JV Boys Scrimmage**	**Travelers Rest HS (new)**	**Travelers Rest HS**	**Wade Hampton HS**
Referee	Jim Geyer	0	C: 865-388-0385		Accepted
U1	Daniel Goodlett	0	C: 864-275-5395		Accepted
U2	_____				
U2	Aminah Richburg	0			**$0.00**
Observer	**Robert (Bob) Wnukowski**	0	C: 864-901-4733	H: 864-509-0625	Accepted

WILLIAMS
00025

Game	Date & Time	Sport & Level	Site	Home	Away
13378	11/13/2014 (Thu) 5:30 PM	Basketball Girls and Boys Scrimmage	Dacusville MS	Dacusville MS	TBA
U1	Aminah Richburg	18			$0.00
U1					
U2	Jonathan (Jonn) Harris	24	C: 864-252-5051	H: 864-244-0214	Accepted
Observer					

[11/10/2014 10:17 PM by Robert (Bob) Wnukowski] - U1's work at 5:30 and U2's work at 6:45. Work both games as two person only.

13555	11/18/2014 (Tue) 6:00 PM	Basketball Girls Scrimmage	Greenville High	Greenville HS	Byrnes HS, Palmetto HS
Referee	lateef muhammad	10	C: 864-363-5511		Accepted
U1	John Williams	15	C: 864-787-4583		Accepted
U1	Charles A. Edens	9	H: 864-299-5355	C: 864-884-5610	Accepted
U2	Sean O'Connell	0	C: 864-907-7639		Accepted
U2	Aminah Richburg	6			$0.00

15044	11/20/2014 (Thu) 5:30 PM	Basketball Girls Scrimmage	Easley HS	Easley HS	Powdersville HS
Referee	Gordon Greer	21	H: 864-244-9152	C: 864-607-1042	Accepted
U1					
U2	Aminah Richburg	18			$0.00
U2	Anthony L. McDavid	13	C: 864-449-1191	W: 864-467-5910	Accepted
U2					

15064	11/22/2014 (Sat) 2:00 PM	Basketball Girls Scrimmage	Carolina Academy and HS	Carolina HS	Christ Church ES
Referee	David C. Kirk	13	C: 864-569-8701	W: 864-859-1005	Accepted
U1					
U2	Aminah Richburg	10			$0.00
U2					

15131	12/2/2014 (Tue) 4:30 PM	Basketball MS Boys	Pleasant Grove BC - Greer	Greenville Hurricanes	Lead Charter
Referee	Ray Martin	14	C: 864-419-3470	H: 864-244-1330	Accepted
U1	Aminah Richburg	11			$60.90
U2	John Williams	15	C: 864-787-4583		Accepted

15133	12/2/2014 (Tue) 5:30 PM	Basketball Varsity Girls	Pleasant Grove BC - Greer	Greenville Hurricanes	Brashier Middle College
Referee	Ray Martin	0	C: 864-419-3470	H: 864-244-1330	Accepted
U1	Aminah Richburg	0			$0.00

[11/25/2014 9:31 PM by Robert (Bob) Wnukowski] - Girls will play 6 minute quarters.

WILLIAMS
00026

Game	Date & Time	Sport & Level	Site	Home	Away
15144	12/4/2014 (Thu) 5:30 PM	Basketball MS Girls and Boys	Northwest MS	Northwest MS	Riverside MS
Referee	Jay Ratterree 16		C: 864-884-0356	W: 864-451-5222	Accepted
U1	Aminah Richburg 21				$61.90
15159	12/8/2014 (Mon) 5:30 PM	Basketball MS Girls and Boys	League Academy	League Academy	Sevier MS
Referee	Byron Caraway 19		C: 864-303-2689		Accepted
U1	Aminah Richburg 13				$54.70
15173	12/11/2014 (Thu) 5:00 PM	Basketball JV Boys	Welcome Baptist Church	Easley Home School	Dixie HS
Referee	joseph Richardson 10		C: 843-676-5081		Accepted
U1	Aminah Richburg 10				$43.00
13289	12/18/2014 (Thu) 5:30 PM	Basketball MS Girls and Boys	Gettys MS (at old Easley HS)	Gettys MS	McCants MS
Referee	Byron Caraway 7		C: 864-303-2689		Accepted
U1	Aminah Richburg 18				$59.20
13544	12/19/2014 (Fri) 5:00 PM	Basketball MS Girls and Boys	Southside Christian School	Southside Christian HS	St Joseph's CS
Referee	Gordon Greer 21		H: 864-244-9152	C: 864-607-1042	Accepted
U1	Aminah Richburg 9				$52.00
13373	1/5/2015 (Mon) 5:30 PM	Basketball MS Girls and Boys	Dacusville MS	Dacusville MS	Starr-Iva MS
Referee	Gary Hullinger 0		C: 864-884-8379	H: 864-644-8192	Accepted
U1	Aminah Richburg 18				$59.20
15287	1/6/2015 (Tue) 5:30 PM	Basketball JV Girls and Boys	Berea HS	Berea HS	Greer HS
Referee	J C BOOKER 16		C: 864-230-9257	C: 864-436-1609	Accepted
U1	Aminah Richburg 13				$62.70
13552	1/8/2015 (Thu) 5:30 PM	Basketball MS Girls and Boys	Woodmont MS at new school	Woodmont MS	Hughes Academy
Referee	Steward Lawrence 10		C: 864-630-8931		Accepted
U1	Aminah Richburg 12				$53.80
15331	1/13/2015 (Tue) 5:00 PM	Basketball JV Boys	St Joseph's CS	St Joseph's CS	Greenville Tech Charter HS
Referee	Charles A. Edens 6		H: 864-299-5355	C: 864-884-5610	Accepted
U1	Aminah Richburg 0				$43.00

WILLIAMS
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Game	Date & Time	Sport & Level	Site	Home	Away
15380	1/23/2015 (Fri) 5:30 PM	Basketball JV Girls and Boys	Berea HS	Berea HS	Southside HS
Referee	lateef muhammad 16		C: 864-363-5511		Accepted
U1	Aminah Richburg 13				$62.70
13575	1/26/2015 (Mon) 5:30 PM	Basketball MS Girls and Boys	Riverside MS	Riverside MS	Northwood MS
Referee	Joseph Elmer 11		H: 864-268-0242		Accepted
U1	Aminah Richburg 9				$52.00
15397	1/27/2015 (Tue) 5:00 PM	Basketball JV Boys	Eastlan Baptist Church	Greenville Tech Charter HS	Greenville Classical
Referee	Joseph Elmer 13		H: 864-268-0242		Accepted
U1	Aminah Richburg 0				$43.00
13406	1/30/2015 (Fri) 5:30 PM	Basketball JV Girls and Boys	Travelers Rest HS (new)	Travelers Rest HS	Southside HS
Referee	joseph Richardson 15		C: 843-676-5081		Accepted
U1	Aminah Richburg 21				$69.90
15504	1/31/2015 (Sat) 11:00 AM	Basketball MS Boys	Northwest MS	Northwest MS	Riverside MS
Referee	T.R. Sloan 27		C: 864-421-2857		Accepted
U1	Aminah Richburg 21				$50.90
13377	2/2/2015 (Mon) 5:30 PM	Basketball MS Girls and Boys	Dacusville MS	Dacusville MS	Walhalla MS
Referee	Sigmund Arnold 14		C: 864-982-9366	W: 864-672-2089	Accepted
U1	Aminah Richburg 18				$59.20
15438	2/6/2015 (Fri) 5:00 PM	Basketball JV Girls and Boys	Southside Christian School	Southside Christian HS	Christ Church ES
Referee	John Jackson 18		C: 864-918-3328	W: 864-241-6115	Accepted
U1	Aminah Richburg 9				$60.00
15529	2/7/2015 (Sat) 3:30 PM	Basketball JV Boys	Carolina Academy and HS	Southside HS	TBA
Referee	James Craig 10		C: 407-928-2165	H: 864-558-1900	Accepted
Referee	David Allison 21		W: 864-306-3201	C: 864-270-5386	Accepted
U1	Aminah Richburg 10				$60.00
15530	2/7/2015 (Sat) 4:45 PM	Basketball JV Boys	Carolina Academy and HS	Carolina HS	TBA
Referee	James Craig 0		C: 407-928-2165	H: 864-558-1900	Accepted
Referee	David Allison 0		W: 864-306-3201	C: 864-270-5386	Accepted
U1	Aminah Richburg 0				$0.00

WILLIAMS
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Game	Date & Time	Sport & Level	Site	Home	Away
15449	2/10/2015 (Tue) 5:00 PM	Basketball JV Girls	Christ Church Episcopal School	Christ Church ES	Southside Christian HS
Referee	Charles A. Edens	6	H: 864-299-5355	C: 864-884-5610	Accepted
U1	Aminah Richburg	0			$43.00
15684	6/24/2015 (Wed) 5:30 PM	Basketball JV Boys Scrimmage	Travelers Rest HS (new)	Berea HS	Woodmont HS
Referee	Robert Mangrum, Jr.	19	H: 864-605-1885	W: 864-239-3923	Accepted
U1	Aminah Richburg	21			$18.90
U2	Cal Williams	31	C: 864-787-5164		Accepted
U2	Jason Murchison	20	C: 678-362-6009		Accepted
Observer	Ken Pelanda	31	C: 864-525-3830	H: 864-297-4190	Accepted
15685	6/24/2015 (Wed) 6:30 PM	Basketball JV Boys Scrimmage	Travelers Rest HS (new)	Travelers Rest HS	Woodmont HS
Referee	Robert Mangrum, Jr.	0	H: 864-605-1885	W: 864-239-3923	Accepted
U1	Aminah Richburg	0			$0.00
U2	Cal Williams	0	C: 864-787-5164		Accepted
U2	Jason Murchison	0	C: 678-362-6009		Accepted
Observer	Ken Pelanda	0	C: 864-525-3830	H: 864-297-4190	Accepted
15686	6/24/2015 (Wed) 7:30 PM	Basketball JV Boys Scrimmage	Travelers Rest HS (new)	Travelers Rest HS	Berea HS
Referee	Robert Mangrum, Jr.	0	H: 864-605-1885	W: 864-239-3923	Accepted
U1	Aminah Richburg	0			$0.00
U2	Cal Williams	0	C: 864-787-5164		Accepted
U2	Jason Murchison	0	C: 678-362-6009		Accepted
Observer	Ken Pelanda	0	C: 864-525-3830	H: 864-297-4190	Accepted
16050	11/10/2015 (Tue) 6:00 PM	Basketball Girls Scrimmage	Hillcrest HS	Hillcrest HS	Greer HS
Referee	David C. Kirk	9	C: 864-569-8701	W: 864-859-1005	Accepted
U1	Audrey Cox	21	C: 864-704-6799		Accepted
U2	John Williams	0	C: 864-787-4583		Accepted
U2	Aminah Richburg	9			$0.00
16078	11/12/2015 (Thu) 6:00 PM	Basketball Girls Scrimmage	Greenville High	Greenville HS	Daniel HS, Mauldin HS
Referee	Byron Caraway	14	C: 864-303-2689		Accepted
Referee	Kenneth Garfield	6	C: 732-925-5031	C: 864-879-2665	Accepted
U1	David C. Kirk	6	C: 864-569-8701	W: 864-859-1005	Accepted
U2	Aminah Richburg	6			$0.00

Game	Date & Time	Sport & Level	Site	Home	Away
16366	11/17/2015 (Tue) 7:00 PM	Basketball Girls Scrimmage	Greer HS	Greer HS	Clinton HS
Referee	**E.A. Williams**	0	C: 864-430-9884	C: 864-294-0857	Accepted
U1	Steward Lawrence	15	C: 864-630-8931		Accepted
U2	Jim Geyer	0	C: 865-388-0385		Accepted
U2	Aminah Richburg	11			**$0.00**
16256	11/19/2015 (Thu) 5:00 PM	Basketball Girls Scrimmage	Woodmont HS (new)	Woodmont HS	Wren HS
Referee	Steward Lawrence	10	C: 864-630-8931		Accepted
U1	**Jay Ratterree**	10	C: 864-884-0356	W: 864-451-5222	Accepted
U2	Jermaine Counts	16	C: 864-553-4122	H: 864-399-9118	Accepted
U2	Aminah Richburg	12			**$0.00**
16111	12/2/2015 (Wed) 5:30 PM	Basketball MS Girls and Boys	League Academy	League Academy	Hughes Academy
Referee	**lateef muhammad**	17	C: 864-363-5511		Accepted
U1	Aminah Richburg	13			**$57.70**
16138	12/3/2015 (Thu) 5:30 PM	Basketball MS Girls and Boys	Mauldin MS	Mauldin MS	Blue Ridge MS
Referee	**Jim Geyer**	15	C: 865-388-0385		Accepted
U1	Aminah Richburg	9			**$55.00**
16162	12/10/2015 (Thu) 5:30 PM	Basketball MS Girls and Boys	Bryson MS	Bryson MS	Ralph Chandler MS
Referee	**John Williams**	0	C: 864-787-4583		Accepted
U1	Aminah Richburg	9			**$55.00**
15983	12/11/2015 (Fri) 5:30 PM	Basketball JV Girls and Boys	Eastside HS	Eastside HS	Blue Ridge HS
Referee	**Chadwick Hendricks**	11	C: 864-358-4927		Accepted
U1	Aminah Richburg	19			**$72.10**
16456	12/14/2015 (Mon) 5:30 PM	Basketball MS Girls and Boys	Tanglewood MS	Tanglewood MS	Greenville MS
Referee	**Thomas Holtz**	19	C: 864-915-0288		Accepted
U1	Aminah Richburg	10			**$55.00**
16119	12/17/2015 (Thu) 5:30 PM	Basketball MS Girls and Boys	Sevier MS	Sevier MS	Beck MS and Academy
Referee	**Michael Crotts**	15	C: 864-329-6785	W: 864-355-0250	Accepted
U1	Aminah Richburg	13			**$57.70**

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Game	Date & Time	Sport & Level	Site	Home	Away
16170	1/7/2016 (Thu) 5:30 PM	Basketball MS Girls and Boys	Greer MS	Greer MS	Northwood MS
Referee	Paul Black 18		C: 864-905-4960	H: 864-241-4034	Accepted
U1	Aminah Richburg 11				$55.90
16102	1/8/2016 (Fri) 6:00 PM	Basketball JV Girls	Southside Christian School	Southside Christian HS	St Joseph's CS
Referee	Aminah Richburg 9				$46.00
U1	Donnie Vick 22		C: 703-343-6586	W: 864-235-5661	Accepted
16062	1/11/2016 (Mon) 5:15 PM	Basketball JV Triple Header	Easley HS	Easley HS	Hillcrest HS
Referee	J C BOOKER 20		C: 864-230-9257	C: 864-436-1609	Accepted
U1	Thomas Holtz 21		C: 864-915-0288		Accepted
U2	Aminah Richburg 18				$99.20
16122	1/13/2016 (Wed) 5:30 PM	Basketball MS Girls and Boys	Sevier MS	Sevier MS	Hughes Academy
Referee	william banister 13		C: 864-230-5763		Accepted
U1	Aminah Richburg 13				$57.70
16408	1/26/2016 (Tue) 5:00 PM	Basketball MS Boys	Welcome Baptist Church	Easley Home School	PAC Panthers
Referee	William. Mack Edwards 9		C: 864-990-7976	H: 864-947-1853	Accepted
U1	Aminah Richburg 10				$64.00
16409	1/26/2016 (Tue) 6:00 PM	Basketball JV Boys	Welcome Baptist Church	Easley Home School	PAC Panthers
Referee	William. Mack Edwards 0		C: 864-990-7976	H: 864-947-1853	Accepted
U1	Aminah Richburg 0				$0.00
16179	1/29/2016 (Fri) 5:30 PM	Basketball MS Girls and Boys	Dacusville MS	Dacusville MS	Liberty MS
Referee	Stanley Clinkscale (Bernard) 22		C: 864-423-1350		Accepted
U1	Aminah Richburg 18				$62.20
16731	2/1/2016 (Mon) 5:30 PM	Basketball MS Girls	Beck Academy at new site	Beck MS and Academy	Bryson MS
Referee	John Williams 9		C: 864-787-4583		Accepted
U1	Aminah Richburg 0				$43.00

WILLIAMS
00031

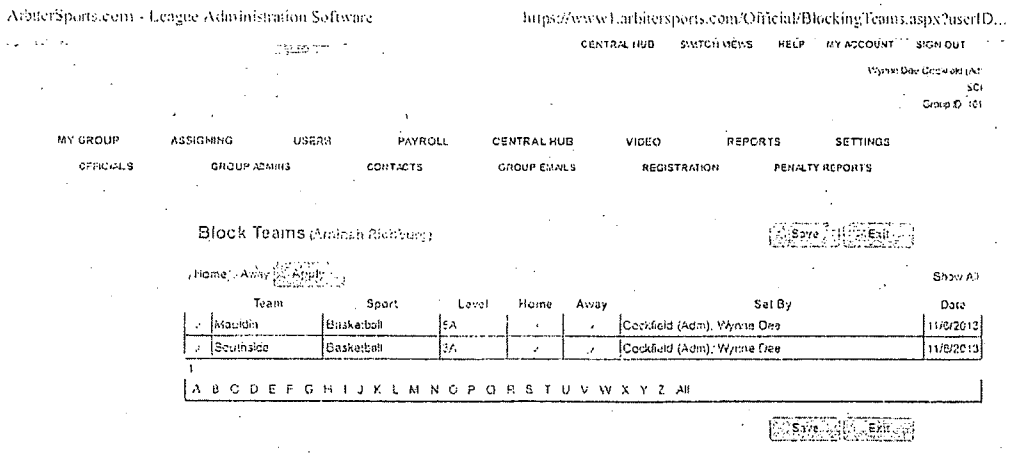
Game	Date & Time	Sport & Level	Site	Home	Away
16749	2/6/2016 (Sat) 12:30 PM	Basketball JV Girls and Boys	Tanglewood MS	TBA	TBA

Referee	**Allan Harden**	22	C: 864-884-2981		Accepted
U1	Michael Crotts	19	C: 864-329-6785	W: 864-355-0250	Accepted
U2	Aminah Richburg	10			**$64.00**

Total: $2,781.60

WILLIAMS
00032

Appellate Exhibit 20 Arbiter Blocked Teams, Falsified Document, SCHSL; 011;



ArbiterSports.com - League Administration Software https://www1.arbitersports.com/Official/BlockingTeams.aspx?userID...

CENTRAL HUB SWITCH VIEWS HELP MY ACCOUNT SIGN OUT

Wynne Dee Cockfield (Adm)
SCI
Group ID: 101

MY GROUP ASSIGNING USERS PAYROLL CENTRAL HUB VIDEO REPORTS SETTINGS

OFFICIALS GROUP ADMINS CONTACTS GROUP EMAILS REGISTRATION PENALTY REPORTS

Block Teams (Arbiter Blocking)

Save Exit

Home | Away | Any

Show All

	Team	Sport	Level	Home	Away	Set By	Date
✓	Mauldin	Basketball	5A	✓	✓	Cockfield (Adm), Wynne Dee	11/6/2013
✓	Southside	Basketball	3A	✓	✓	Cockfield (Adm), Wynne Dee	11/6/2013

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z All

Save Exit

About | Contact | Privacy | Terms
© 2013 ArbiterSports
Server: 13 | Reset Session

1 of 1

5346/1536
Confidential - Subject to Protective Order
Produced by SCHSL
011

Appellate Exhibit 21 Plagiarized SCBOA District I Contract; Williams 0001 ;

SCBOA District I Contract

The intent of this contract is to serve to an informational document in order to enhance communication procedures as much as it is to be a guideline for professional conduct for the officials of the District I South Carolina Basketball Officials Association.

FAILURE TO RETURN A SIGNED CONTRACT WILL RESULT IN FAILURE TO RECEIVE A SCHEDULE.

1. I agree to return all communications to the director, assistant director, secretary/treasurer, and assignor promptly regardless of the time of the year. I understand that the failure to return communications in a timely fashion can result in the loss of cooperation points.
2. I agree to keep all contact information current with the District I director and secretary at all times of the year.
3. I agree to return all forms to the appropriate person by the imposed deadlines. I understand that I will not receive a schedule if I fail to turn in a physical form and markoff form by the deadlines.
4. I agree to pay all required dues by the deadlines. I understand that I will not receive a schedule if I fail to pay dues.
5. I agree to pay all fines imposed due to failure to meet deadlines or follow proper procedures. I understand that I will not receive a schedule if I fail to pay the imposed fine(s).
6. I understand that I must meet all required state and district meetings and that failure to meet the requirements can result in the loss of cooperation points.
7. I understand that as a member of District I I represent all officials of District I and of the South Carolina Basketball Officials Association. I will conduct myself in a professional and ethical manner at any basketball event whether or not I am a spectator or working the game.
8. I understand that the District I director has the authority to enforce professional standards and to accept or reject my transfer to another district or readmittance to the SCBOA.
9. I understand that I may be put on probation, and/or suspended, or dismissed if I fail to conduct myself in a professional manner as a District I basketball official and if I fail to follow District I guidelines as listed in this contract.
10. I understand that I must communicate in writing to the District I director if I choose to take a leave of absence for a season for which I have previously registered.
11. I understand that it is proper procedure to contact the District I director before communicating with the SCHSL office regarding SCBOA concerns.
12. I agree to keep my markoff lists updated frequently and to pay a fine if I am contacted for an assignment and I am not available.
13. I agree to notify the District I director, the assignor, and the SC High School League IMMEDIATELY if I am unable to make an assigned game. I understand that sending an email or leaving a voice message does not relieve me of this requirement until I receive a personal response from the director or assignor. OUTSIDE the 14 day window – by email/phone; WITHIN the 14 day window – by email/phone; WITHIN 48 hours of game time – ONLY by phone.
14. I agree that I will NOT get my own replacement if I cannot make it to my assignment.
15. I agree that I will NOT swap assignments unless directed to do so by the District I director or assignor.
16. I agree to report to my District I sub-varsity assignments by a minimum of 30 minutes prior to game time and be on the court for duty 15 minutes prior to tip-off. I agree to contact the District I director if I fail to be at the game site on time.
17. I agree to contact the District I director and assignor if my partner(s) are late for assignments and to contact my partner(s) by phone if I incur problems in route to the game site that will cause me to be late for my assignment.
18. I agree to report to the District I director if a different crew member hired from the original crew works any assignment and I have not had prior notification from the District I director, assignor or the SCHSL.
19. I agree that the referee of the crew has the responsibility to contact the crew a minimum of 24 hours prior to game time. However, the umpire(s) should initiate contact within the 24 hour period to all crew and to the District I assignor if the referee has failed to fulfill his/her responsibility.
20. I agree to report to the District I assignor (locally booked varsity games and sub-varsity games) and director if my partner fails to communicate with me 24 hours prior to game time.
21. I agree that I reside in the District I area or that I have received permission from the appropriate district director to work in District I.
22. I agree that I will not ask for payment of the game fee at the game site. I understand to contact the District I assignor and director if I fail to receive my game fee in a timely fashion.
23. I agree to inform the District I director of any problems involved with my assignments that could result in communication from the schools to the District I director. I understand that the failure to report can result in disciplinary procedures.
24. I agree that I will not use the District I membership for solicitation purposes.
25. I agree to honor my assigned commitments to work SCHSL basketball games both during the regular or off-season as assigned by the SCHSL or SCBOA District I Assignor. I understand that should I officiate games for sanctioned SCHSL teams at any sanctioned SCHSL high school within the District #1 boundaries for assignors other than those previously mentioned, either during the regular or off season, I will be subject to disciplinary actions such as probation, suspension, and/or dismissal as determined by the SCBOA District I Director.

SIGNATURE _____ DATE 10-26-15

WILLIAMS
00001

Exhibit A

Appellate Exhibit 22 Code of Ethics Williams 00002;

CODE OF ETHICS

1. This Code of Ethics for athletic officials has been developed to protect and promote the best interest of interscholastic athletics and the officiating profession. Its primary purpose is to clarify and distinguish ethical and approved professional practices from those that are detrimental and harmful.
2. I will study the rules, observe the work of other officials, and will, at all times, attempt to improve myself.
3. I will endeavor to keep my body in sound physical condition. I will have regular physical examinations to assure myself and my associates of my physical capabilities.
4. I will remember that while my work as an official is important, I must conduct myself in such a way that attention is drawn, not to me, but to the boys and girls playing the game. I will keep in mind that the game is more important than the wishes of any individual player or the ambitions of any individual official.
5. I will dress and maintain my appearance in a manner befitting the dignity and importance of my profession.
6. I will shape my character and conduct so as to be a worthy example to the boys and girls who play under my jurisdiction.
7. I will be fair and unbiased in my decision, rendering them without regard to the score.
8. I will give my complete cooperation to the schools, which I serve, the officials' association of which I am a member and to the South Carolina High School League.
9. I will cooperate with my fellow officials and will do nothing to cause them public embarrassment.
10. I will, in my actions on the floor or field, be firm but not overbearing; courteous, but not ingratiating; positive, but never rude; dignified, but never "cocky"; friendly, but not companionable; calm, but always alert.
11. I will not officiate a game after having any alcoholic drink that day.
12. I will not approach coaches or athletic directors, personally or by mail relative to assignments or ratings.
13. I will not make a request to officiate a specific game or games for any coach, school or conference.
14. I will not criticize or attempt to explain a fellow officials' judgment or decision.
15. I will honor all contracts in spite of possible inconvenience or financial loss.

As an approved South Carolina High School League official, it is hereby agreed, stipulated and understood that my employment as a high school league official is that of an independent contractor and not as an employee of the South Carolina Basketball Officials Association, South Carolina High School League or of the school districts or high schools competing in an interscholastic athletic competition event.

It is further stipulated and agreed that the consideration for each game officiated will be negotiated by a contract price for officiating a single contest according to the applicable rules governing the interscholastic competition for which I have agreed to officiate. I understand that the contract price for officiating each contest will vary from contest to contest and sport to sport.

I hereby agree to officiate the interscholastic competition according to the applicable federation rulebook, as well as any appropriate state adaptations.

I hereby release the South Carolina High School League, the South Carolina Basketball Officials Association and the participating school districts from all claims which I might have, except for this release, have or hereafter may have, and from any bar by whether imposed by common law or statute or under the South Carolina laws of workers' compensation on account of any accident which may occur and/or injury which I may sustain in the course of carrying out my responsibilities as stated above.

It is further agreed that I am assuming all the risks of this undertaking and that I am acting as an independent contractor.

It is further stipulated and agreed that my compensation is based upon a lump sum fee for a single competitive event and that no withholdings of these funds are made by the payor.

I understand and agree that either school retains the authority not to employ my services.

I understand and agree that the booking office will make my assignments according to the rules pertaining to booking officials. Releases and restrictions to be observed in booking my schedule for the season will be sent to the booking office. Subject to these releases and restrictions, the booking office is empowered to accept and place assignments for me on dates on my schedule. I agree to uphold and observe the constitution, by-laws and booking regulations of the South Carolina Basketball Officials Association.

I believe that interscholastic athletics is an integral part of our secondary school program and that good officiating promotes enjoyment of these athletic contests as well as protection to the participants. Because I want to render a service to the youth of South Carolina and progressively improve and elevate officiating standards in South Carolina, in signing this application I agree to abide by the above ~~standards and Code~~ of Ethics.

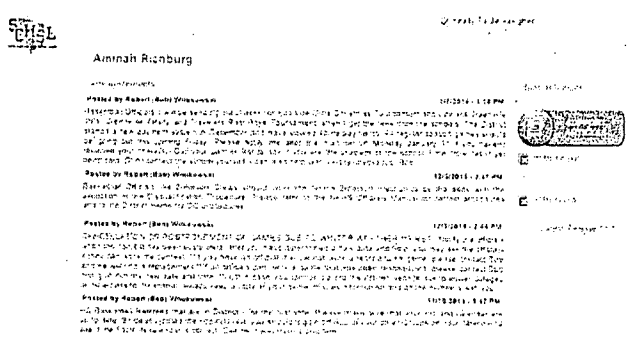
Date 10/15/14 Signature _____

ALL candidates/NEW officials MUST submit this application to the state office

WILLIAMS
00002

Exhibit D

Appellate Exhibit 23 Appellate SCHSL Arbiter Website/ Announcements Bob Wnukowski,



Aminah Richburg

Appellate Exhibit 24 SCBOA Board Members of February 2016; Williams (no document number given);

SUPPLEMENTAL RESPONSE: SCBOA Board members, as of February 2016, were:

1. William ("Al") Banister
   114 Forrester Creek Drive
   Greenville, SC 29607

2. Kevin Brown
   147 Warrenton Way
   Simpsonville, SC 29681

3. Audrey Cox
   305 A East Lee Road
   Taylors, SC 29687

4. David Dendy
   113 Yorkshire Drive
   Greenville, SC 29615

5. Gary Hullinger
   665 Robert P. Jeanes Road
   Easley, SC 29640

6. Stewart Lawrence
   240 Baucom Park Drive
   Greer, SC 29650

7. James W. Meekins Jr.
   216 Cheddington Dr.
   Greenville, SC 29607

8. Ken Pelanda
   3 Jester Court
   Simpsonville, SC 29681

9. Robert (Bob) Wnukowski
   641 Canterbury Road
   Piedmont, SC 29673

10. E.A. ("Rico") Williams
    # 1 Ridgeside Court
    Greenville, SC 29617

Appellate Exhibit 25 Non-SCBOA Games Assigned to Appellate; Williams 00016;

Non-SCBOA basketball games assigned to Aminah Richburg

Year 2013

Golden Strip YMCA – Dec. 14 (3 games)
Latino League – Nov. 3 (2 games)

Year 2015

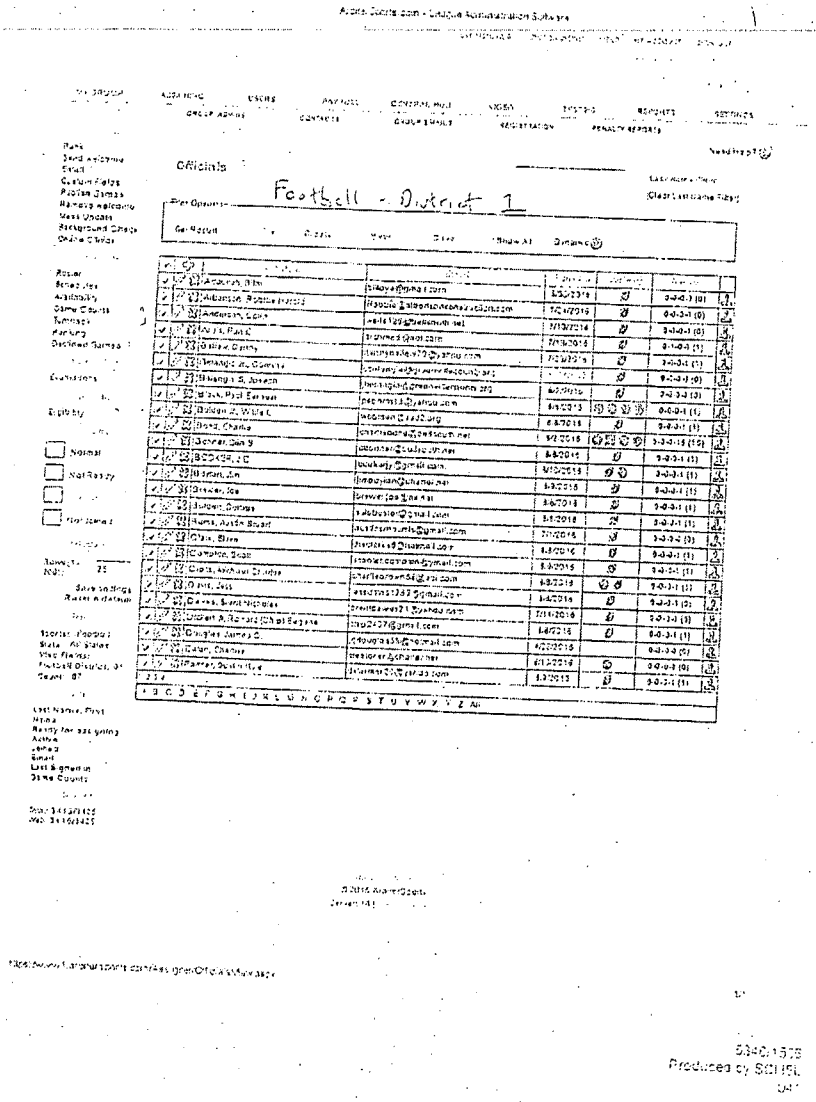
City Recreational League – Jan. 21 (3 games)

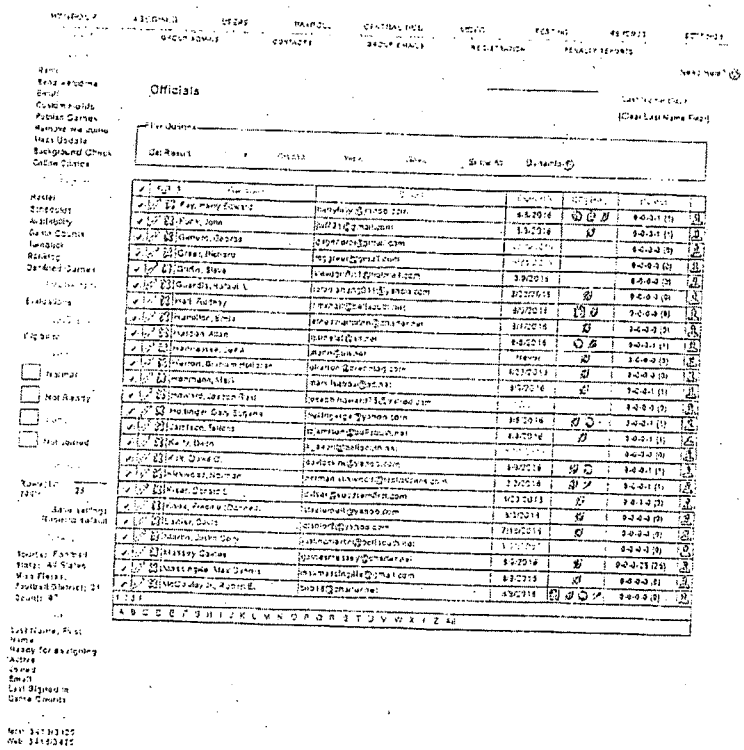
Golden Strip YMCA – Jan. 10 (4 games)
" " Jan. 17 (3 games)
" " Jan. 25 (3 games)
" " Dec. 19 (4 games)

Latino League – April 12 (2 games)
" " Nov. 1 (2 games)

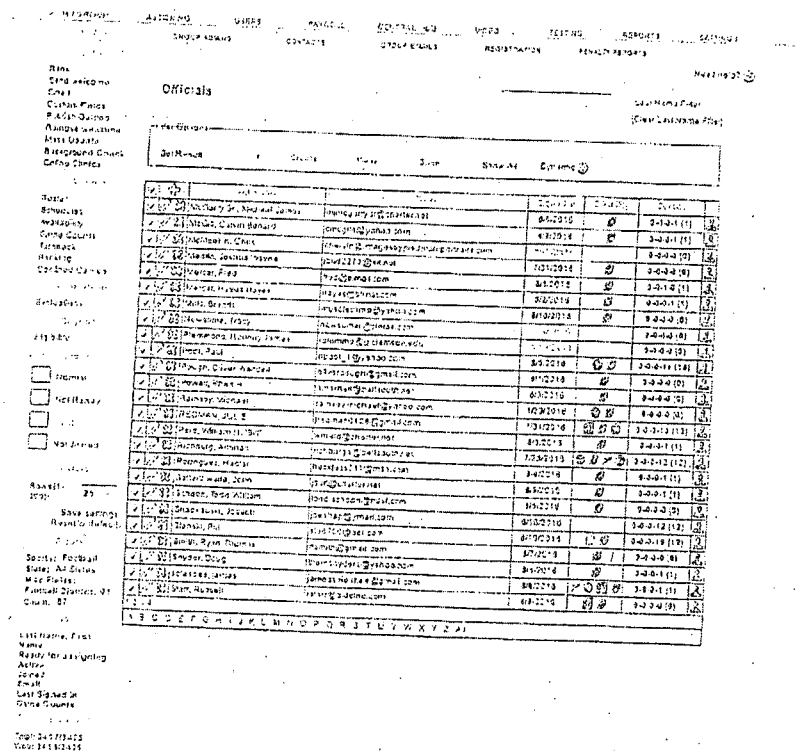
WILLIAMS
00016

Appellate Exhibit 26 Football Listing District One 2016; SCHSL 041-044;

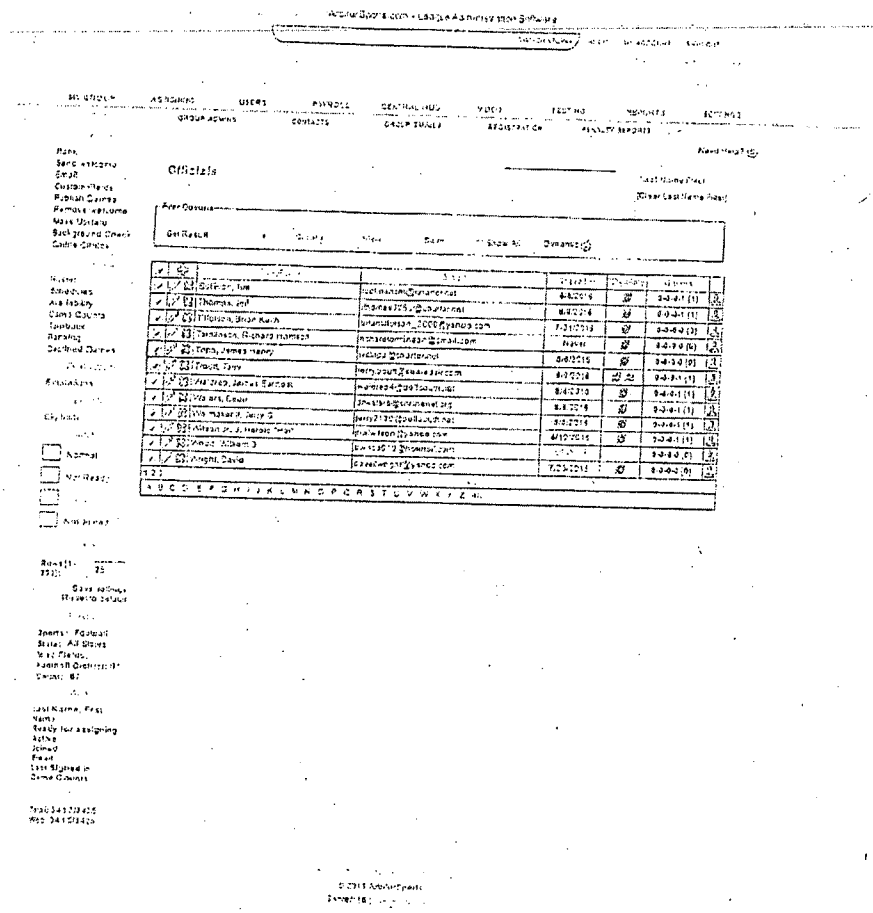




Officials



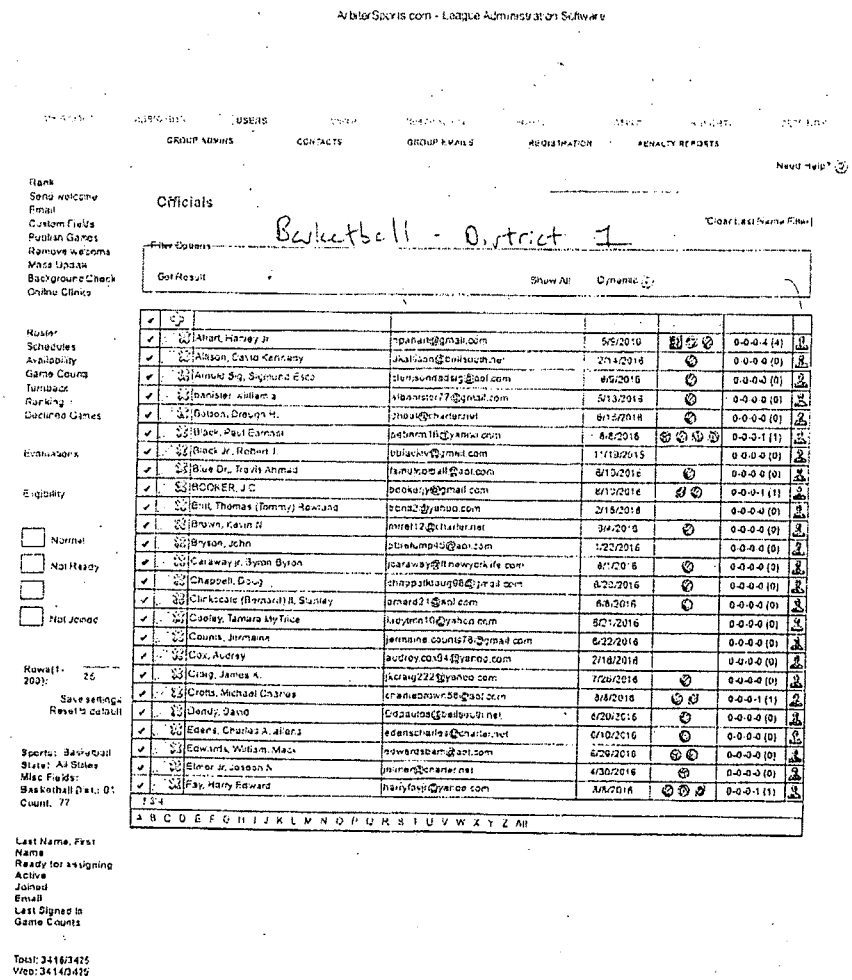
Officials



Officials

Produced by SCHIS

Appellate Exhibit 27 Basketball Listing District One 2016; SCHSL 037-040;



ArbiterSports.com - League Administration Software

GROUP ADMINS CONTACTS GROUP EMAILS REGISTRATION PENALTY REPORTS

Officials

Basketball - District 1

Filter Options

Get Result | Show All | Dynamic

✔	Ahart, Harley Jr	hparker@gmail.com	9/5/2010		0-0-0-4 (4)
✔	Allison, Carla Kennedy	ckallison@bellsouth.net	2/14/2016		0-0-0-0 (0)
✔	Amuso Sr., Sigmund Esco	stevesondads@aol.com	8/5/2016		0-0-0-0 (0)
✔	Bannister, William a	wbannister77@gmail.com	5/13/2016		0-0-0-0 (0)
✔	Batson, Dreyon H.	jhoal@charternet	8/15/2016		0-0-0-0 (0)
✔	Black, Paul Earnest	pebarm1@yahoo.com	8/8/2016		0-0-3-1 (1)
✔	Black Jr, Robert J	rblacky@gmail.com	11/13/2015		0-0-0-0 (0)
✔	Blue Dr., Travis Ahmad	familyfootball@aol.com	8/10/2016		0-0-0-0 (0)
✔	BOOKER, J C	bookerjc@gmail.com	8/10/2016		0-0-0-1 (1)
✔	Bull, Thomas (Tommy) Rowland	tbrad2@yahoo.com	2/15/2016		0-0-0-0 (0)
✔	Brown, Kevin N	knrel12@charter.net	3/4/2016		0-0-0-0 (0)
✔	Bryson, John	jbirdump40@aol.com	1/20/2016		0-0-0-0 (0)
✔	Caraway jr, Byron Byron	jcaraway@ftmeyerlife.com	8/1/2016		0-0-0-0 (0)
✔	Chappell, Doug	chappdldoug98@gmail.com	8/22/2016		0-0-0-0 (0)
✔	Clinkscale (Barnard) II, Stanley	jamard21@aol.com	8/8/2016		0-0-0-0 (0)
✔	Coakley, Tamara MyTrice	tlucyann10@yahoo.com	8/21/2016		0-0-0-0 (0)
✔	Counts, Jermaine	jermaine.counts78@gmail.com	8/22/2016		0-0-0-0 (0)
✔	Cox, Audrey	audrey.cox94@yahoo.com	2/18/2016		0-0-0-0 (0)
✔	Craig, James A.	jacraig222@yahoo.com	7/26/2016		0-0-0-0 (0)
✔	Crotts, Michael Charles	charliebrown56@aol.com	8/8/2016		0-0-0-1 (1)
✔	Dandy, Dana	Ddpaulos@bellsouth.net	8/20/2016		0-0-0-0 (0)
✔	Edens, Charles A. Allens	edenscharles@charter.net	8/10/2016		0-0-0-0 (0)
✔	Edwards, William, Mack	edwardsbam@aol.com	8/20/2016		0-0-0-0 (0)
✔	Elmer Jr, Joseph A	jaimer@charter.net	4/30/2016		0-0-0-0 (0)
✔	Fay, Harry Edward	harryfay@yahoo.com	3/8/2016		0-0-0-1 (1)

1-34

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z All

Roster
Schedules
Availability
Game Counts
Turnback
Ranking
Declined Games

Evaluators

Eligibility

Normal
Not Ready
Not Joined

Rows(1-200): 25

Save settings
Reset to default

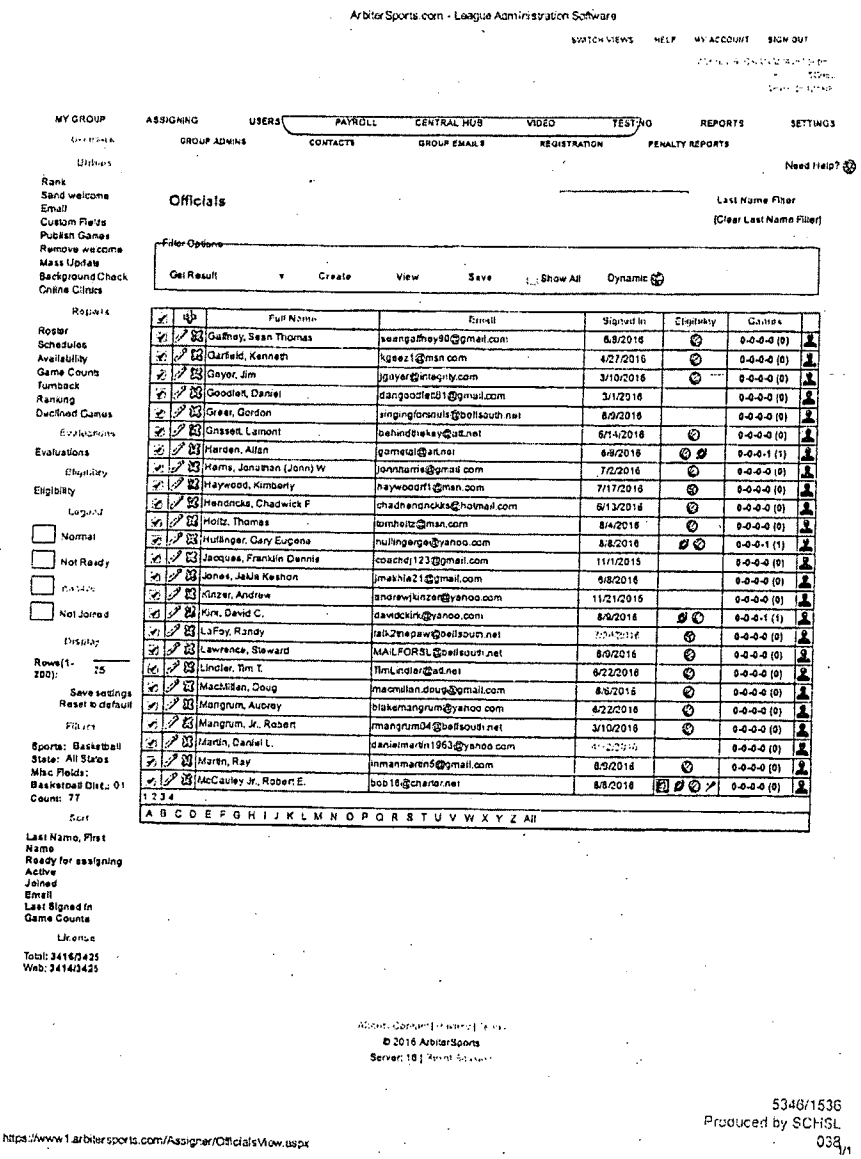
Sports: Basketball
State: All States
Misc Fields:
Basketball Pref.: 01
Count: 77

Last Name, First Name
Ready for assigning
Active
Joined
Email
Last Signed In
Game Counts

Total: 3416/3425
Web: 3414/0425

https://www1.arbitersports.com/Assigner/OfficialsView.aspx

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SWITCH VIEWS HELP MY ACCOUNT SIGN OUT

MY GROUP ASSIGNING USERS PAYROLL CENTRAL HUB VIDEO TESTING REPORTS SETTINGS

GROUP ADMINS CONTACTS GROUP EMAILS REGISTRATION PENALTY REPORTS

Need Help?

Officials

Last Name Filter

[Clear Last Name Filter]

Filter Options

Get Result ▾ Create View Save Show All Dynamic

	Full Name	Email	Signed In	Eligibility	Games
	Gaffney, Sean Thomas	seangaffney90@gmail.com	6/8/2016		0-0-0-0 (0)
	Garfield, Kenneth	kgeez1@msn.com	4/27/2016		0-0-0-0 (0)
	Geyer, Jim	jgeyer@integrity.com	3/10/2016		0-0-0-0 (0)
	Goodlett, Daniel	dangoodlett81@gmail.com	3/1/2016		0-0-0-0 (0)
	Greer, Gordon	singingforsouls@bellsouth.net	8/9/2016		0-0-0-0 (0)
	Grissett, Lamont	behindtiekey@att.net	6/14/2016		0-0-0-0 (0)
	Harden, Allan	gametall@att.net	6/8/2016		0-0-0-1 (1)
	Harris, Jonathan (John) W	jonnharris@gmail.com	7/2/2016		0-0-0-0 (0)
	Haywood, Kimberly	haywoodrf1@msn.com	7/17/2016		0-0-0-0 (0)
	Hendricks, Chadwick F	chadhendricks@hotmail.com	6/13/2016		0-0-0-0 (0)
	Holtz, Thomas	tomholtz@msn.com	8/4/2016		0-0-0-0 (0)
	Hullinger, Gary Eugene	hullingerge@yahoo.com	8/8/2016		0-0-0-1 (1)
	Jacques, Franklin Dennis	coachdj123@gmail.com	11/1/2015		0-0-0-0 (0)
	Jones, Jalia Keshon	jmakhia21@gmail.com	6/8/2016		0-0-0-0 (0)
	Kinzer, Andrew	andrewjkinzer@yahoo.com	11/21/2015		0-0-0-0 (0)
	Kirk, David C.	davidckirk@yahoo.com	8/9/2016		0-0-0-1 (1)
	LaFoy, Randy	talk2thepaw@bellsouth.net	[illegible]		0-0-0-0 (0)
	Lawrence, Steward	MAILFORSL@bellsouth.net	8/8/2016		0-0-0-0 (0)
	Lindler, Tim T.	TimLindler@att.net	6/22/2016		0-0-0-0 (0)
	MacMillan, Doug	macmillan.doug@gmail.com	8/8/2016		0-0-0-0 (0)
	Mangrum, Aubrey	blakemangrum@yahoo.com	6/22/2016		0-0-0-0 (0)
	Mangrum, Jr., Robert	jrmangrum04@bellsouth.net	3/10/2016		0-0-0-0 (0)
	Martin, Daniel L.	danielmartin1963@yahoo.com	[illegible]		0-0-0-0 (0)
	Martin, Ray	inmanmartin5@gmail.com	8/9/2016		0-0-0-0 (0)
	McCauley Jr., Robert E.	bob16@charter.net	8/8/2016		0-0-0-0 (0)

1 2 3 4

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z All

Rank
Send welcome Email
Custom Fields
Publish Games
Remove welcome
Mass Update
Background Check
Online Clinics

Rosters
Roster
Schedules
Availability
Game Counts
Turnback
Ranking
Declined Games

Evaluations
Evaluations

Eligibility
Eligibility

Legend
Normal
Not Ready
[illegible]
Not Joined

Display
Rows(1-200): 25
Save settings
Reset to default

Filters
Sports: Basketball
State: All States
Misc Fields:
Basketball Dist.: 01
Count: 77

Sort
Last Name, First Name
Ready for assigning
Active
Joined
Email
Last Signed In
Game Counts

License
Total: 3416/3425
Web: 3414/3425

[illegible] | Terms
© 2016 ArbiterSports
Server: 18 | [illegible]

https://www1.arbitersports.com/Assigner/OfficialsView.aspx

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USERS

GROUP ADMINS | CONTACTS | GROUP EMAILS | REGISTRATION | PENALTY REPORTS

Need Help?

Rank
Send welcome Email
Custom Fields
Publish Games
Remove welcome
Mass Update
Background Check
Online Clinics

Roster
Schedules
Availability
Game Counts
Turnback
Ranking
Declined Games

Evaluations

Eligibility

- Norma
- Not Ready
-
- Not Joined

Rows(1-200): 25

Save settings
Reset to default

Sports: Basketball
State: All States
Misc Fields:
Basketball Dist.: 01
Count: 77

Last Name, First Name
Ready for assigning
Active
Joined
Email
Last Signed In
Game Counts

Total: 3415/3425
Won: 3414/3425

Officials

[Clear Last Name Filter]

Filter Options

Get Report | Show All | Dynamic

✔		McDavid, Anthony L.	tmcdavid@greenvillecounty.com	8/14/2016		0-0-0-0 (0)
✔		McGregor, Henry	bwmcgregor@charter.net	9/5/2014		0-0-0-0 (0)
✔		Meekins Jr Jr., James W Woodrow	jmeekins@greenvillecounty.org	7/12/2016		0-0-0-0 (0)
✔		Mistal, Bobby	bobbym13@cne.com	12/3/2015		0-0-0-0 (0)
✔		Muhammad, Tajeol	tajmuh2011@yahoo.com	5/12/2016		0-0-0-0 (0)
✔		Murchison, Jason	jason.murchison1@gmail.com	4/26/2016		0-0-0-0 (0)
✔		Norris, Jennifer	scnsl.crsnet1.vp@gmail.com	6/20/2016		0-0-0-0 (0)
✔		O'Connell, Sean A	soconne@g.clemson.edu	6/21/2015		0-0-0-0 (0)
✔		Peluardo Miranda, Ken	ken@senpalenda.com	3/31/2016		0-0-0-0 (0)
✔		Ramsey, Michael	ramsey.michael@yahoo.com	1/29/2015		0-0-0-0 (0)
✔		Ratterree, Jay	jayratterree@gmail.com	7/23/2016		0-0-0-0 (0)
✔		Richardson, Joseph	ugkick2@yahoo.com	8/23/2015		0-0-0-0 (0)
✔		Richburg, Amniah	richburga@bellsouth.net	7/26/2016		0-0-0-12 (12)
✔		Robinson, Edward Milton	er5743@gmail.com	10/23/2015		0-0-0-0 (0)
✔		Rodriguez, Hector	Rockjoss21@msn.com	8/8/2016		0-0-0-1 (1)
✔		Sims, Calvin	calvin.sims@ga.com	4/26/2016		0-0-0-0 (0)
✔		Sloan Jr, T.R.	trsloan@yahoo.com	1/13/2015		0-0-0-0 (0)
✔		Snyder, Kendra Janelle	ksnyder10.ks@gmail.com	8/8/2016		0-0-0-0 (0)
✔		Stinehaw, James	jamesstinehaw@gmail.com	8/8/2016		0-0-0-1 (1)
✔		Vick, Donnie Ray	heydonneray@yahoo.com	1/7/2016		0-0-0-0 (0)
✔		Ward, Donald Cleveland	dward@scbjandsacademy.net	6/29/2016		0-0-0-0 (0)
✔		Waller, Timothy C	csp1108@hotmail.com	5/17/2016		0-0-0-0 (0)
✔		Williams, Carl	carlwill12@icloud.com	1/19/2013		0-0-0-0 (0)
✔		Williams, E.A.	aricowns@charter.net	7/30/2016		0-0-0-0 (0)
✔		Williams, John	jecup@live.com	5/17/2016		0-0-0-0 (0)

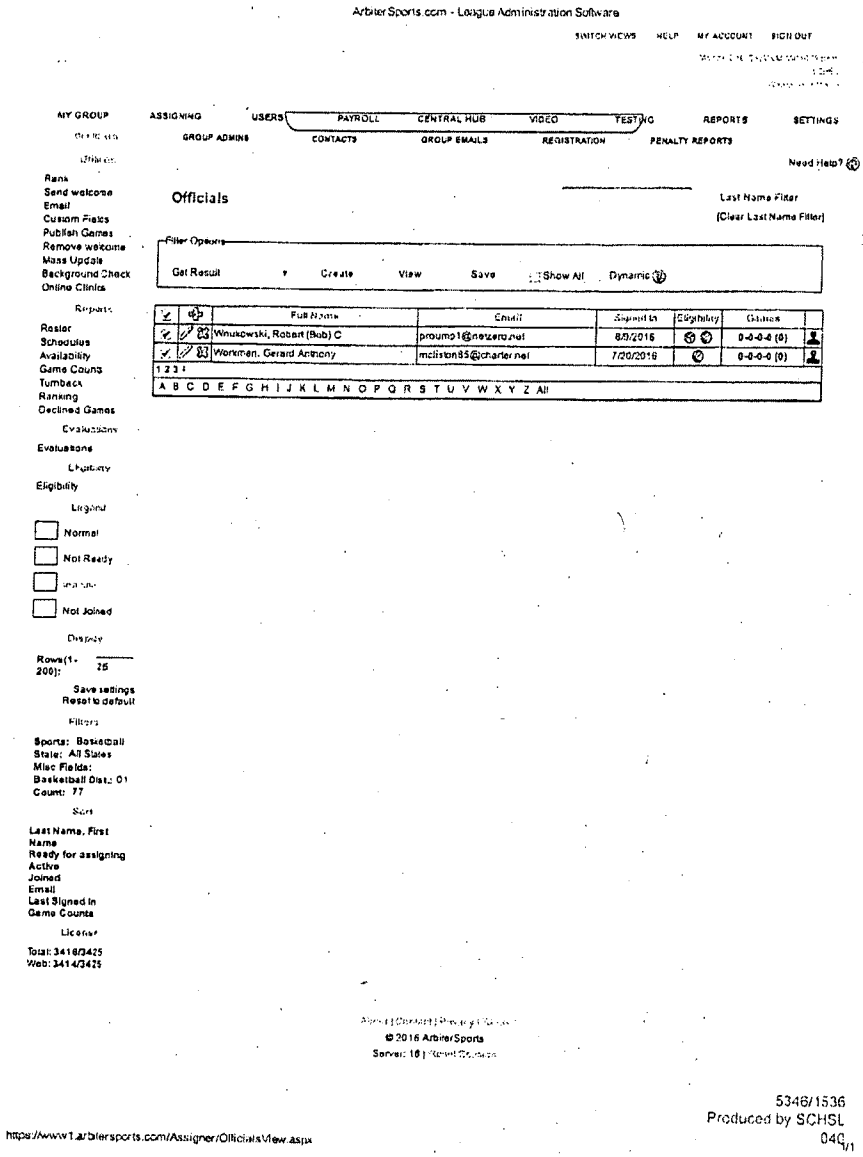
1 2 »

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z All

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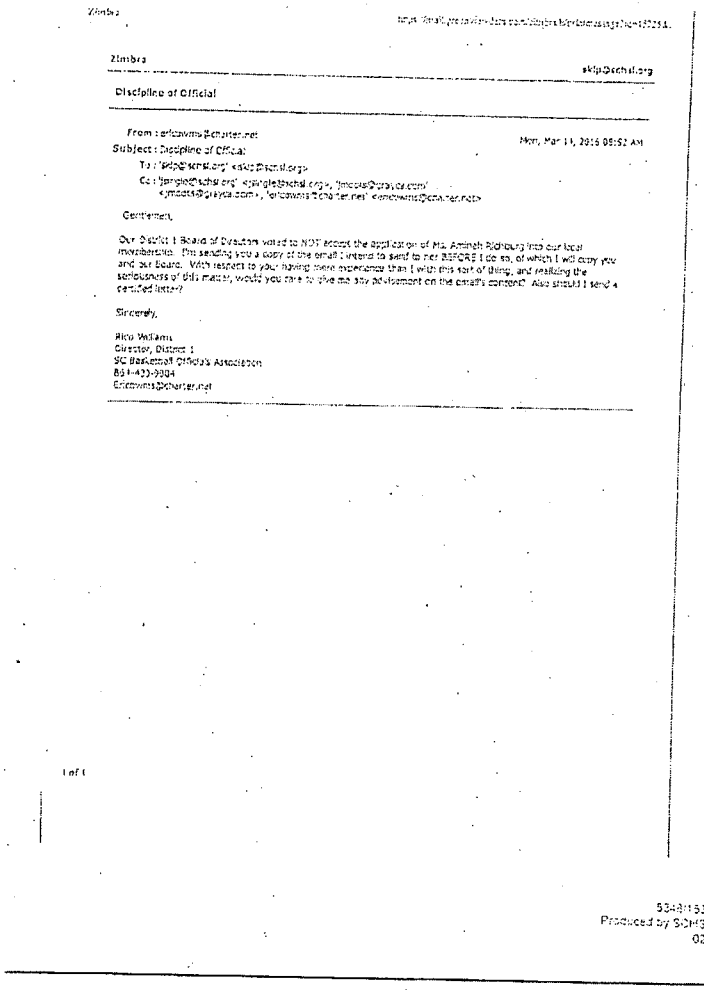
https://www1.arbitersports.com/Assigner/OfficialsView.aspx

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Produced by SCHSL
039



5346/1536
Produced by SCHSL
040 1/1

Appellate Exhibit 28 Respondent Rico Williams email to SCHSL of Appellate termination; March 14, 2016;SCHSL 020;



Zimbra

Zimbra skip@schsl.org

Discipline of Official

From : ericawms@charter.net Mon, Mar 14, 2016 08:52 AM
Subject : Discipline of Official
To : "'skip@schsl.org'" <skip@schsl.org>
Cc : "'jpringle@schsl.org'" <jpringle@schsl.org>, "'jmccoll@qwlaw.com'" <jmccoll@qwlaw.com>, "'ericawms1@charter.net'" <ericawms1@charter.net>

Gentlemen,

Our District 1 Board of Directors voted to NOT accept the application of Ms. Aminah Richburg into our local membership. I'm sending you a copy of the email I intend to send to her BEFORE I do so, of which I will copy you and our Board. With respect to you having more experience than I with this sort of thing, and realizing the seriousness of this matter, would you care to give me any development on the email's content. Also should I send a certified letter?

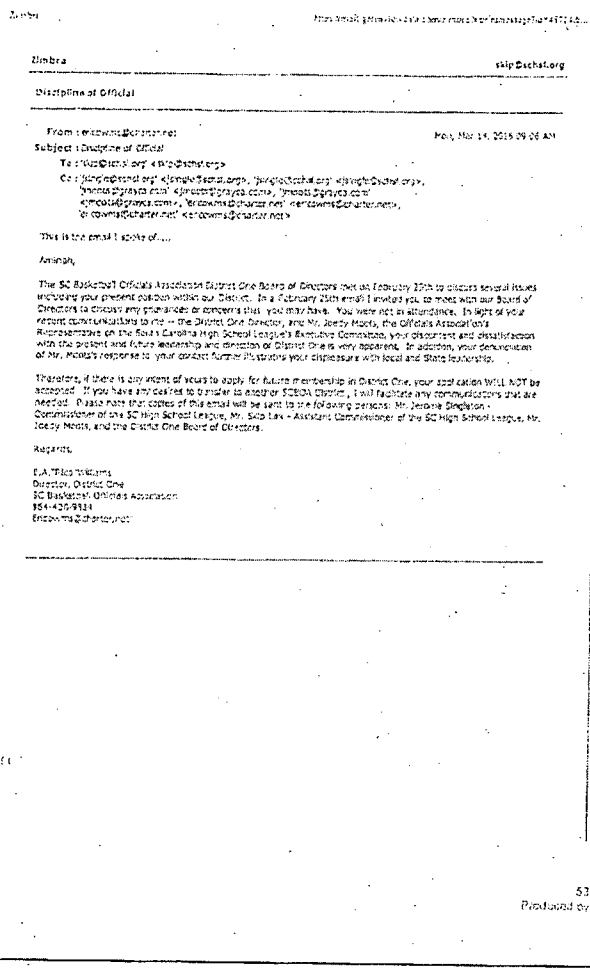
Sincerely,

Rico Williams
Director, District 1
SC Basketball Officials Association
864-420-9804
Ericawms@charter.net

1 of 1

5348/1535
Produced by SCHSL
020

Appellate Exhibit 29 Respondent Rico Williams email to SCHSL Appellate termination, March 14, 2016; SCHSL 019;



Zimbra skip@schsl.org

Discipline of Official

From : rwilliams@charter.net Mon, Mar 14, 2016 09:06 AM
Subject : Discipline of Official
To : "skip@schsl.org" <skip@schsl.org>
Cc : "jking@schsl.org" <jking@schsl.org>, "jenglish@schsl.org" <jenglish@schsl.org>, "jmoss@gryco.com" <jmoss@gryco.com>, "jmeals@gryco.com" <jmeals@gryco.com>, "rjmccall@gryco.com", "rwilliams@charter.net" <rwilliams@charter.net>, "dr.downs@charter.net" <dr.downs@charter.net>

This is the email I spoke of....

Amanda,

The SC Basketball Officials Association District One Board of Directors met on February 25th to discuss several issues including your present position within our District. In a February 26th email I invited you to meet with our Board of Directors to discuss any grievances or concerns that you may have. You were not in attendance. In light of your recent communications to me – the District One Director, and Mr. Joedy Meals, the Officials Association's Representative on the South Carolina High School League's Executive Committee, your discontent and dissatisfaction with the present and future leadership and direction of District One is very apparent. In addition, your denunciation of Mr. Meals's response to your concern further illustrates your displeasure with local and State leadership.

Therefore, if there is any intent of yours to apply for future membership in District One, your application WILL NOT be accepted. If you have any desires to transfer to another SCBOA District, I will facilitate any communications that are needed. Please note that copies of this email will be sent to the following persons: Mr. Jerome Singleton - Commissioner of the SC High School League, Mr. Skip Lee - Assistant Commissioner of the SC High School League, Mr. Joedy Meals, and the District One Board of Directors.

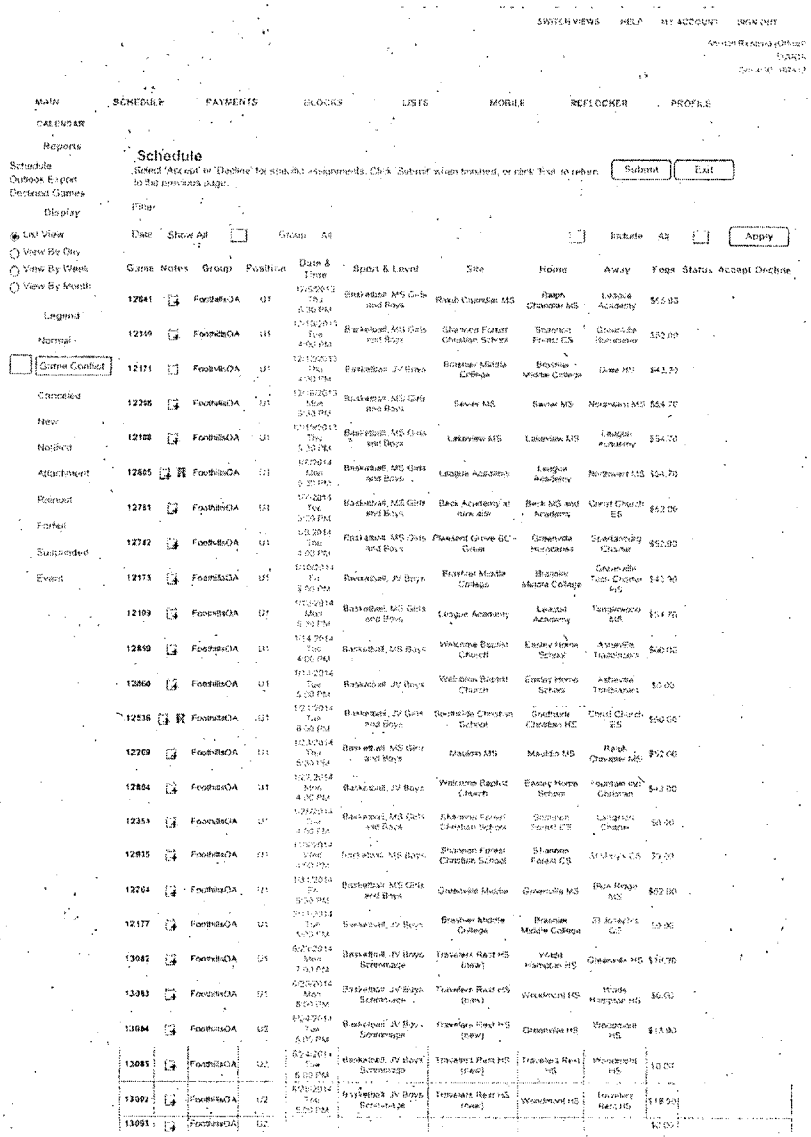
Regards,

D.A. "Rico" Williams
Director, District One
SC Basketball Officials Association
864-420-9834
Rwilliams@charter.net

1 of 1

5346/538
Produced by SCHSL
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Appellate Exhibit 30 Arbiter Appellate Game Schedule , Group, Date, Sport, Site , Home, Away, Fees;



SWITCH VIEWS HELP MY ACCOUNT SIGN OUT

MAIN SCHEDULE PAYMENTS BLOCKS LISTS MOBILE REFLOCKER PROFILE

CALENDAR

Reports

Schedule
Outlook Export
Declared Games

Display

Schedule

Select 'Accept' or 'Decline' for each of assignments. Click 'Submit' when finished, or click 'Exit' to return to the previous page.

Submit Exit

Filter

Date Show All Group All Include All Apply

- List View
- View By Day
- View By Week
- View By Month

Legend

Normal

Game Conflict

Canceled

New

Notified

Attachment

Rained

Forfeit

Suspended

Event

Game	Notes	Group	Position	Date & Time	Sport & Level	Site	Home	Away	Fees	Status	Accept	Decline
12641		Football/OA	QB	9/5/2015 Sat 8:30 PM	Basketball, MS Girls and Boys	Brandon Christian MS	Reign Christian MS	Lebanon Academy	$65.85			
12149		Football/OA	MS	12/15/2015 Tue 4:00 PM	Basketball, MS Girls and Boys	Shannon Forest Christian School	Shannon Forest CS	Greenville Renaissance	$82.00			
12171		Football/OA	QB	12/15/2015 Tue 4:30 PM	Basketball, JV Boys	Brandon Middle College	Brandon Middle College	Dixie MS	$43.20			
12285		Football/OA	QB	12/16/2015 Wed 5:30 PM	Basketball, MS Girls and Boys	Seven MS	Seven MS	Neighbors MS	$64.70			
12188		Football/OA	QB	12/17/2015 Thu 5:30 PM	Basketball, MS Girls and Boys	Lakeview MS	Lakeview MS	League Academy	$54.70			
12685	R	Football/OA	QB	9/2/2014 Mon 6:30 PM	Basketball, MS Girls and Boys	League Academy	League Academy	Northwest MS	$54.70			
12781		Football/OA	QB	9/4/2015 Tue 5:00 PM	Basketball, MS Girls and Boys	Back Academy at Park MS	Back MS and Academy	Christ Church ES	$62.06			
12782		Football/OA	QB	9/8/2014 Thu 4:00 PM	Basketball, MS Girls and Boys	Pleasant Grove GC - Grace	Greenville Renaissance	Spartanburg Christian	$52.00			
12173		Football/OA	QB	9/10/2014 Tue 3:30 PM	Basketball, JV Boys	Brandon Middle College	Brandon Middle College	Greenville Tech Charter HS	$43.20			
12189		Football/OA	QB	9/10/2014 Wed 5:30 PM	Basketball, MS Girls and Boys	League Academy	League Academy	Tanglewood MS	$54.70			
12859		Football/OA	QB	9/14/2014 Sun 4:00 PM	Basketball, MS Boys	Welcome Baptist Church	Easley Home School	Asheville Tournament	$48.00			
12860		Football/OA	QB	9/14/2014 Sun 5:30 PM	Basketball, JV Boys	Welcome Baptist Church	Easley Home School	Asheville Tournament	$0.00			
12536	R	Football/OA	QB	12/15/2014 Tue 8:00 PM	Basketball, JV Girls and Boys	Greenville Christian School	Gruffalo Christian MS	Christ Church ES	$60.00			
12209		Football/OA	QB	12/17/2014 Thu 5:00 PM	Basketball, MS Girls and Boys	Madison MS	Madison MS	Reign Christian MS	$52.00			
12884		Football/OA	QB	9/22/2014 Mon 4:30 PM	Basketball, JV Boys	Welcome Baptist Church	Easley Home School	Fountain Inn Christian	$43.00			
12353		Football/OA	QB	12/22/2014 Tue 3:30 PM	Basketball, MS Girls and Boys	Shannon Forest Christian School	Shannon Forest CS	Livingston Center	$0.00			
12935		Football/OA	QB	12/29/2014 Mon 4:00 PM	Basketball, MS Boys	Shannon Forest Christian School	St Lawrence Forest CS	St Lawrence CS	$0.00			
12704		Football/OA	QB	10/1/2014 Tue 5:30 PM	Basketball, MS Girls and Boys	Greenville Middle	Greenville MS	Rice Ridge MS	$62.00			
12177		Football/OA	QB	9/15/2014 Tue 4:30 PM	Basketball, JV Boys	Brandon Middle College	Brandon Middle College	St Michaels CS	$0.00			
13082		Football/OA	QB	8/27/2014 Wed 7:30 PM	Basketball, JV Boys Scrimmage	Travelers Rest MS (new)	Valley Hampton HS	Greenville HS	$50.00			
13083		Football/OA	QB	8/28/2014 Thu 8:00 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Woodmont HS	Wade Hampton HS	$0.00			
13084		Football/OA	QB	8/29/2014 Fri 6:00 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Greenville HS	Woodmont HS	$0.00			
13085		Football/OA	QB	8/4/2014 Tue 6:00 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Travelers Rest HS	Woodmont HS	$0.00			
13092		Football/OA	QB	8/30/2014 Tue 6:00 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Woodmont HS	Travelers Rest HS	$18.00			
13091		Football/OA	QB						$0.00			

				9/26/2014 Thu 6:00 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Wade Hampton HS	Woodmont HS		
13094		FoothillsOA	U2	9/26/2014 Thu 7:00 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Travelers Rest HS	Wade Hampton HS	$0.00	
13378		FoothillsOA	U1	11/13/2014 Thu 5:30 PM	Basketball, Girls and Boys Scrimmage	Dacusville MS	Dacusville MS	TBA	$0.00	
13555		FoothillsOA	U2	11/18/2014 Tue 6:00 PM	Basketball, Girls Scrimmage	Greenville High	Greenville HS	Byrnes HS, Palmetto HS	$0.00	
15044		FoothillsOA	U2	11/20/2014 Thu 5:30 PM	Basketball, Girls Scrimmage	Easley HS	Easley HS	Powdersville HS	$0.00	
15064		FoothillsOA	U2	11/22/2014 Sat 2:00 PM	Basketball, Girls Scrimmage	Carolina Academy and HS	Carolina HS	Christ Church ES	$0.00	
16131		FoothillsOA	U1	12/2/2014 Tue 4:30 PM	Basketball, MS Boys	Pleasant Grove BC - Greer	Greenville Hurricanes	Lead Charter	$60.90	
15133		FoothillsOA	U1	12/2/2014 Tue 5:30 PM	Basketball, Varsity Girls	Pleasant Grove BC - Greer	Greenville Hurricanes	Bastian Middle College	$0.00	
15144		FoothillsOA	U1	12/4/2014 Thu 5:30 PM	Basketball, MS Girls and Boys	Northwest MS	Northwest MS	Riverside MS	$61.90	
15159		FoothillsOA	U1	12/8/2014 Mon 5:30 PM	Basketball, MS Girls and Boys	League Academy	League Academy	Sevier MS	$54.70	
15173		FoothillsOA	U1	12/11/2014 Thu 5:00 PM	Basketball, JV Boys	Welcome Baptist Church	Easley Home School	Dixie HS	$43.00	
13289		FoothillsOA	U1	12/18/2014 Thu 5:30 PM	Basketball, MS Girls and Boys	Gettys MS (at old Easley HS)	Gettys MS	McCants MS	$59.20	
13644		FoothillsOA	U1	12/19/2014 Fri 5:00 PM	Basketball, MS Girls and Boys	Southside Christian School	Southside Christian HS	St Joseph's CS	$52.00	
13373		FoothillsOA	U1	1/5/2015 Mon 5:30 PM	Basketball, MS Girls and Boys	Dacusville MS	Dacusville MS	Stan-hyn MS	$59.20	
15287		FoothillsOA	U1	1/6/2015 Tue 5:30 PM	Basketball, JV Girls and Boys	Berea HS	Berea HS	Greer HS	$62.70	
13552		FoothillsOA	U1	1/8/2015 Thu 5:30 PM	Basketball, MS Girls and Boys	Woodmont MS at new school	Woodmont MS	Hughes Academy	$53.00	
15331		FoothillsOA	U1	1/13/2015 Tue 5:00 PM	Basketball, JV Boys	St Joseph's CS	St Joseph's CS	Greenville Tech Charter HS	$43.00	
15380		FoothillsOA	U1	1/23/2015 Fri 5:30 PM	Basketball, JV Girls and Boys	Berea HS	Berea HS	Southside HS	$62.70	
13575		FoothillsOA	U1	1/26/2015 Mon 5:30 PM	Basketball, MS Girls and Boys	Riverside MS	Riverside MS	Northwood MS	$52.00	
15397		FoothillsOA	U1	1/27/2015 Tue 5:00 PM	Basketball, JV Boys	Eastlan Baptist Church	Greenville Tech Charter HS	Greenville Classical	$43.00	
13406		FoothillsOA	U1	1/30/2015 Fri 5:30 PM	Basketball, JV Girls and Boys	Travelers Rest HS (new)	Travelers Rest HS	Southside HS	$69.90	
15504		FoothillsOA	U1	1/31/2015 Sat 11:00 AM	Basketball, MS Boys	Northwest MS	Northwest MS	Riverside MS	$50.90	
13377		FoothillsOA	U1	2/2/2015 Mon 5:30 PM	Basketball, MS Girls and Boys	Dacusville MS	Dacusville MS	Walhalla MS	$59.20	
15430	R	FoothillsOA	U1	2/6/2015 Fri 5:00 PM	Basketball, JV Girls and Boys	Southside Christian School	Southside Christian HS	Christ Church ES	$80.00	
15529		FoothillsOA	U1	2/7/2015 Sat 3:30 PM	Basketball, JV Boys	Carolina Academy and HS	Southside HS	TBA	$60.00	
15530		FoothillsOA	U1	2/7/2015 Sat 4:45 PM	Basketball, JV Boys	Carolina Academy and HS	Carolina HS	TBA	$0.00	
15449		FoothillsOA	U1	2/10/2015 Tue 5:00 PM	Basketball, JV Girls	Christ Church Episcopal School	Christ Church ES	Southside Christian HS	$43.00	
15684		FoothillsOA	U1	6/24/2015 Wed 5:30 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Berea HS	Woodmont HS	$18.00	
15685		FoothillsOA	U1	6/24/2015 Wed 6:30 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Travelers Rest HS	Woodmont HS	$0.00	
15686		FoothillsOA	U1	6/24/2015 Wed 7:30 PM	Basketball, JV Boys Scrimmage	Travelers Rest HS (new)	Travelers Rest HS	Berea HS	$0.00	
16050		FoothillsOA	U2	11/10/2015 Tue 6:00 PM	Basketball, Girls Scrimmage	Hillcrest HS	Hillcrest HS	Greer HS	$0.00	
16078		FoothillsOA	U2	11/12/2015 Thu 6:00 PM	Basketball, Girls Scrimmage	Greenville High	Greenville HS	Daniel HS, Mauldin HS	$0.00	

16306		FoothillsOA	U2	11/17/2015 Tue 7:00 PM	Basketball, Girls Scrimmage	Greer HS	Greer HS	Clinton HS	$0.00	
16256		FoothillsOA	U2	11/19/2015 Thu 5:00 PM	Basketball, Girls Scrimmage	Woodmont HS (new)	Woodmont HS	Wren HS	$0.00	
16111		FoothillsOA	U1	12/2/2015 Wed 5:30 PM	Basketball, MS Girls and Boys	League Academy	League Academy	Hughes Academy	$57.70	
16138		FoothillsOA	U1	12/3/2015 Thu 5:30 PM	Basketball, MS Girls and Boys	Mauldin MS	Mauldin MS	Blue Ridge MS	$55.00	
16162		FoothillsOA	U1	12/10/2015 Thu 5:30 PM	Basketball, MS Girls and Boys	Bryson MS	Bryson MS	Ralph Chandler MS	$55.00	
15983		FoothillsOA	U1	12/11/2015 Fri 5:30 PM	Basketball, JV Girls and Boys	Eastside HS	Eastside HS	Blue Ridge HS	$72.10	
16456		FoothillsOA	U1	12/14/2015 Mon 5:30 PM	Basketball, MS Girls and Boys	Tanglewood MS	Tanglewood MS	Greenville MS	$55.00	
16119		FoothillsOA	U1	12/17/2015 Thu 5:30 PM	Basketball, MS Girls and Boys	Sevier MS	Sevier MS	Beck MS and Academy	$57.70	
16170		FoothillsOA	U1	1/7/2016 Thu 5:30 PM	Basketball, MS Girls and Boys	Greer MS	Greer MS	Northwood MS	$55.90	
16102	R	FoothillsOA	Referee	1/8/2016 Fri 6:00 PM	Basketball, JV Girls	Southside Christian School	Southside Christian HS	St Joseph's CS	$46.00	
16062		FoothillsOA	U2	1/11/2016 Mon 5:15 PM	Basketball, JV Triple Header	Easley HS	Easley HS	Hillcrest HS	$69.20	
16122		FoothillsOA	U1	1/13/2016 Wed 5:30 PM	Basketball, MS Girls and Boys	Sevier MS	Sevier MS	Hughes Academy	$57.70	
16408		FoothillsOA	U1	1/26/2016 Tue 5:00 PM	Basketball, MS Boys	Welcome Baptist Church	Easley Home School	PAC Panthers	$34.00	
16409		FoothillsOA	U1	1/26/2016 Tue 6:00 PM	Basketball, JV Boys	Welcome Baptist Church	Easley Home School	PAC Panthers	$0.00	
16179	R	FoothillsOA	U1	1/29/2016 Fri 5:30 PM	Basketball, MS Girls and Boys	Duncanville MS	Duncanville MS	Liberty MS	$62.70	
16731		FoothillsOA	U1	2/1/2016 Mon 5:30 PM	Basketball, MS Girls	Beck Academy at new site	Beck MS and Academy	Bryson MS	$43.00	
16749		FoothillsOA	U2	2/6/2016 Sat 12:30 PM	Basketball, JV Girls and Boys	Tanglewood MS	TBA	TBA	$84.00	
167338		SCHSL	SV - Line Judge	10/13/2016 Thu 7:00 PM	Football, JV	Carolina Academy	Carolina Academy JV	Emerald	$52.00	
165701		SCHSL	SV - Line Judge	10/20/2016 Thu 6:30 PM	Football, JV	St. Joseph's HS	St. Joseph's JV	Chapman	$52.00	
167806		SCHSL	SV - Line Judge	10/27/2016 Thu 5:30 PM	Football, MS-8	Pickens HS	Pickens MS	Riverside MS (Pendleton)	$60.00	
18330	R	SCUOA	Bases	2/20/2017 Mon 6:30 PM	Softball, Scrimmages	Easley HS	Easley	Liberty	$0.00	
172289		SCHSL	Umpire 2	2/23/2017 Thu 5:30 PM	Lacrosse, Varsity Girls	St. Joseph's HS	St. Joseph's	Mauldin	$60.00	
172358		SCHSL	Umpire 2	2/27/2017 Mon 5:30 PM	Lacrosse, Varsity Girls	Gville's - Slinlee Sta	Greenville	Wade Hampton (G)	$60.00	
18363	R	SCUOA	Bases	3/2/2017 Thu 5:30 PM	Softball, Scrimmages	Lakeside Park FC	Brashier Middle College	Anderson, Christian School	$0.00	
173627		SCHSL	Umpire 2	3/3/2017 Fri 5:30 PM	Lacrosse, Varsity Girls	Wade Hampton HS (G)	Wade Hampton (G)	Mauldin	$62.70	
173338		SCHSL	Umpire 2	3/7/2017 Tue 6:00 PM	Lacrosse, Varsity Girls	Eastside HS	Eastside	Spartanburg	$68.10	
172719		SCHSL	Umpire 2	3/8/2017 Wed 5:30 PM	Lacrosse, JV Girls	Gville's - Slinlee Sta	Greenville	Hillcrest	$53.00	
173352		SCHSL	Umpire 2	3/14/2017 Tue 5:30 PM	Lacrosse, JV Girls	Mauldin HS	Mauldin	J.L. Mann	$53.00	
173422		SCHSL	Umpire 2	3/14/2017 Tue 5:30 PM	Lacrosse, Varsity Girls	Woodmont HS	Woodmont	T.L. Hanna	$61.80	
172291		SCHSL	Umpire 2	3/17/2017 Fri 5:30 PM	Lacrosse, Varsity Girls	St. Joseph's HS	St. Joseph's	Woodmont	$60.00	
18078	R	SCUOA	Plate	3/23/2017 Thu 5:30 PM	Softball, Single Game	East North St Academy	Greenville Academy and Middle School	Riverside (GVL) MS	$62.00	
172308		SCHSL	Umpire 2	3/24/2017 Fri 5:30 PM	Lacrosse, JV Girls	Hillcrest HS	Hillcrest	Riverside	$53.00	

172301		SCHSL	Umpire 2	3/24/2017 Fri 7:00 PM	Lacrosse, Varsity Girls	Hillcrest HS	Hillcrest	Riverside	$51.00	
18911	R	SCUOA	Bases	3/29/2017 Wed 5:30 PM	Softball, Single Game	Fisher MS	Fisher MS	Gilder MS	$56.00	
173340		SCHSL	Umpire 2	3/31/2017 Fri 6:00 PM	Lacrosse, Varsity Girls	Eastside HS	Eastside	Clinton	$68.10	
176678		SCHSL	Umpire 2	4/3/2017 Mon 5:30 PM	Lacrosse, JV Girls	Woodmont HS	Woodmont JV	Hillcrest	$9.00	
18425	R	SCUOA	Plate	4/6/2017 Thu 5:30 PM	Softball, Single Game	Tanglewood MS	Tanglewood MS	Lakeview MS	$62.00	
173629		SCHSL	Umpire 2	4/7/2017 Fri 5:30 PM	Lacrosse, Varsity Girls	Wade Hampton HS (G)	Wade Hampton (G)	Riverside	$69.00	
177860		SCHSL	Umpire 2	4/18/2017 Tue 5:30 PM	Lacrosse, Varsity Girls	G-Wade - Sirrine Sta	Greenville	St. Joseph's	$66.00	
18426	R	SCUOA	Plate	4/19/2017 Tue 5:30 PM	Softball, Single Game	Tanglewood MS	Tanglewood MS	Riverside MS	$0.00	

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Williams, Johnathan															
Williams, Larry															
Willis, Tammy															
Whitlock, Patrick															
Wnukowski, Bob	****					****	****	****		****	****	***	***		
Workman, Gerard	****	****	****	****	****	****	****	****	****		****	***	***	***	
Muhammed, George															
Houston, Michael															
Terry, Rod															
Hammontree, Lance															
Yates, Roy															
Richardson, Joe	****	****	****	****	****	****	****	****	****		****	***	***	***	
Carter, Shawn															
Britt, Tommy	****	****	****		****		****	****	****	****	****	***	***		
McNabb, Murray															
Thompson, Brian															
Clinkscale, Kimberly															
Robinson, Ed	****	****	****	****	****		****	****	****	****	****				
Young, Nathan	****					--									
Misztal, Robert	****							****	****	****		***	***		
Vick, Donnie	****	****	****	****	****	****	****	****		****					
Self, Donnie	****	****		****											
Young, Jakia	****	****			****	****		****		****	****	***	***		
Mangrum, Blake		****	****	****	****	****	****	****	****	****	****				
Seelig, Scott		****													
Butler, Tim		****													
Jacques, Dennis		****	****	****	****	****		****		****		***	***		
Blue, Travis		****	****	****	****	****	****		****	****	****				
Gaffney, Sean				****	****	****			****		****	***	***	***	

Martin, Daniel															
Martin, Ray	****	****	****	****	****	****	****		****	****	****				
Mazzoli, Robert															
McAlister, Lanny															
McCauley, Bob	****	****	****	****	****	****			****		****	***	***	***	
McDavid, Tony	****	****	****	****	****	****		****		****	****	***	***	***	
McGregor, Benny															
Meekins, James	****	****	****	****		****	****	****	****	****	****	****	****	***	
Muhammad, Lateef	****	****	****	****	****	****	****	****	****	****	****	***	***	***	
Murchison, Jason		****				****						****	****	****	
Norris, Jenny															
O,Connell, Sean	****	****	****	****	****	****	****	****	****						
Pelanda, Ken	****	****	****	****	****	****	****	****	****		****	***	***	***	
Ramsey, Michael															
Ratterree, Jay	****	****	****	****	****	****	****		****		****	***	***	***	
Richburg, Aminah	****		****				****		****			***	***	***	
Simpson, Tyler															
Sims, Calvin	****		****	****	****		****	****		****	****	***	***	***	
Sloan, T.R.				****					****	****		****	****	****	
Snyder, Kendra						****	****	****		****					
Solesbee, Jim	****			****	****	****		****	****		****	***	****	***	
Stanford, Tom															
Sullivan, Robert															
Thomason, Joe															
Ward, Don	****				****	****	****	****			****	***	***		
Welch, Ray															
Williams, Cal	****	****	****	****	****	****	****	****	****	****					
Williams, John	****	****	****	****	****	****	****	****	****	****	****	***	***	***	
Williams, Rico	****	****	****	****	****	****	****	****	****	****	****	***	***	***	

Crotts, Michael	****			****				****		****		***	***	***	
Dendy, David	****	****	****	****	****	****	****	****	****	****	****	****	****	****	
Edens, Charles	****	****	****	****		****					****	***	***	***	
Edwards, Mack			****			****	****	****	****	****	****	***	***		
Elmer, Joe	****	****		****	****	****		****	****	****	****	***	***	***	
Fay, Harry															
Floyd, Teresa															
Garfield, Ken	****	****	****	****	****	****		****	****		****	***	***	***	
Geyer, Jim	****	****	****	****			****	****	****	****	****	****	****	****	
Goodlett, Daniel		****	****			****		****				***	***		
Greer, Gordon	****		****			****			****			***	***		
Grissett, Lamont	****	****	****						****			***	***		
Harden, Allan	****	****	****	****	****	****	****	****		****	****	***	***	***	
Harris, Kenny															
Haywood, Kim															
Harris, John	****	****				****	****	****	****		****	***	***		
Hendricks, Chad	****	****		****		****		****	****		****	***	***	***	
Holtz, Tom	****		****	****	****		****	****	****	****	****	***	***	***	
Hullinger, Gary	****	****	****	****	****	****	****				****	***	***	***	
Hunter, Cissily															
Hyle, Marty															
Kirk, David	****	****	****	****	****	****	****		****	****	****	***	***	****	
LaFoy, Randy	****		****	****	****		****	****	****	****	****	***	***	***	
Lawrence, Steward	****	****	****	****	****	****	****	****	****	****	****	***	***	***	
Lindler, Tim	****	****	****	****	****	****	****	****	****	****		***	***	***	
MacMillan, Doug	****	****	****	****	****	****	****	****	****	****	****	***	***	***	
Mangrum, Robert	****	****	****	****	****	****	****		****	****	****	***	***	***	

2015-2016 SCBOA District #1 Roster

Name	31-Aug-15	14-Sep-15	21-Sep-15	28-Sep-15	5-Oct-15	12-Oct-15	19-Oct-15	26-Oct-15	2-Nov-15	9-Nov-15	10-Jan-15	Rule Book	Case Book	Mechanics Manual	District Dues
Double / Single						Mechanic's MTG					Mid-Season Mtg				
Ahart, Harvey	****	****	****	****		****	****	****		****	****	***	***	***	
Allison, David	****		****	****	****	****	****	****			****	***	***	***	
Arnold, Sigmund	****	****	****	****	****	****	****	****	****		****	***	***	***	
Banister, Al	****	****	****	****	****	****	****		****	****	****	***	***	***	
Bates, Fred															
Batson, Dreugh	****	****	****	****	****		****	****	****	****	****	***	***	***	
Bennett, Joseph															
Black, Paul		****		****	****	****	****		****	****	****	***	***	***	
Booker, J.C.	****	****	****	****	****	****	****	****	****	****	****	***	***	***	
Brown, Frankie															
Brown, Steve															
Brown, Kevin	****	****	****	****	****	****	****	****	****	****	****	***	***	***	
Bryson, John															
Calhoun, Nantambu															
Caraway, Byron	****	****		****	****	****	****				****	***	***	***	
Carr, Tom															
Chappell, Doug	****	****		****		****	****	****	****	****	****	***	***	***	
Clinkscale, Bernard	****	****	****	****	****	****	****	****	****	****	****	***	***	***	
Cooley, Tamara	****		****		****	****	****	****				***	***		
Counts, Jermaine	****		****		****	****	****	****				***	***		
Courtright, Scotty															
Cox, Audrey	****	****	****		****	****	****	****	****	****		***	***		
Craig, James	****	****	****	****	****	****	****	****	****	****	****	***	***	***	

Kinzer, Andrew			****
Fay, Harry			****
Atwell, Bob			****

Appellate Exhibit 32 Emails with Appellate and Respondent SCHSL Joedy Moots February 17-24, 2016;

You're seeing Basic Mail because you're using an unsupported Internet browser. Upgrade your browser for the full Yahoo experience.
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aminah Account Info Sign Out Home

Inbox Contacts Notepad Calendar

Compose

Inbox (2334)
Drafts (7) Empty
Sent
Spam (3) [Empty]
Trash (57) [Empty]

My Folders [Edit]

Sponsored

Psoriasis Nutrients
4 Heart Attack Warnings
Women Should Never Ignore

Harry's Top Selling New Razor Has Men's Brands Worried
Sponsored An upstart company is producing razors that don't jack

Actions Apply Previous Next

Re: Fw: Information for Official

From: "Joedy Moots" <jmoots@grayca.com>

To: "aminah richburg" <richburga@bellsouth.net>

Full Headers Printable View

Aminah,
You are correct, I only went on what was said in the emails and text. I didn't mean you were insubordinate but that if one of my staff talked to me like that, I would consider it insubordination. Believe me, the basketball directors and I have gotten into many disagreements because I am always taking up for my officials. But you can't win an argument with your director because they have too much power within the organization. You have to find a way to get along. Like I said, I have no knowledge of your officiating ability. I can definitely see there is a personality conflict and the best thing you can do is go to a different district. If I were you, in a respectful way, I would ask him to elaborate on his accusations about schools and officials marking you off. You seem like an extremely intelligent young lady and I hope you stick with officiating because we need more females in sports. I really cant help you with Rico. But if there is anything I can do for you, I would gladly help. I am hoping I get assigned the upper state finals this weekend. If I do, I will be at all games. I will be in the officials suite. I would love to sit down and talk to you.
Joedy

VZYG5IqGc

On Feb 23, 2016 5:05 PM, "aminah richburg" <richburga@bellsouth.net> wrote:

Mr. Moots, I am disappointed with your response and I believe that you response is prejudiced on Mr. Williams behalf. I have not communicated with anyone except Mr. Williams. It was Rico Williams that sent all written communications, I merely forwarded the communications to you. I have a right as a human being to communicate to anyone when I have been harassed. Mr. Williams asked if I wore sweat pants and I communicated to him that I do not wear or own sweat pants is that all. I am always dressed professionally and clean according to the SCHL officials dress code requirement. Unfortunately, Mr. Williams has contracted numerous recreation organizations that require sports officials in the Greenville area where I reside and his position I felt was a conflict of interest with his position with the South Carolina High School League whereas he is able to control officiating opportunities and further use his position of power. I have not had any problems with any officials when I have been assigned games and I have not had any problems at any schools. My assignments have not changed at all and I have officiated games at the same schools for the past three years. The only blocks that I am aware of are blocks I have created in the system. Mr. Williams is not attempting to help me at all, in fact his behavior and communications have been destructive. If there was a problem, it was never communicated and as I stated before, my assignments have not changed in the past three years. I have officiated games in the same schools with the same officials every year. Changing officiating districts will create a personal burden for me. I am a professional and I get along with all officials I work with and administrators. Again Mr. Moots, I am disappointed with your response which is personal and biased on behalf of Mr. Williams. I am quite sure that if you take time and review all of the documentation presented on my behalf as my Officials Representative and also take time to review my assigned games for the past three years, you will see that Mr. Williams responded unprofessionally towards me as the District One Director. Your accusable statement to insubordination on my part is unfounded and unmerited. I only sent one text message to Rico Williams communicating my response to his previous cellular phone call, which I have a right to do as a human being. Mr. Williams began the conversation with communicating with me that I will be assigned to officiate games at Furman University and I responded that I sent him a text earlier acknowledging the assignment then Rico Williams stated that someone told him that I had on sweat pants for a previously assigned game with the SCHL. I told Mr. Williams that I do not wear or own sweat pants is that all. My statement was not disrespectful and my text only communicated my position on how Mr. Williams began the conversation by discussing his personal officials assigning business and followed up with disrespect and harassment by asking me if I wore sweat pants to a previous SCHL game. It is evident that I have done nothing wrong and my officiating skills, officiating dress and level of professionalism were not a problem until I communicated my disdain to Rico Williams. At this point, I only sought unbiased representation from my Officials Representative. unfortunately the officials representative responded like a District Director's representative. Please communicate my position as a District One Basketball Official for District One for 2016-2017. Mr. Williams stated that I was not in compliance for some reason after my recent text communication, I did not receive any communication before the 2015-2016 Basketball Season began that I was not in compliance. Mr.

Moots, I want you to know that I am a professional at all times all communications are considered business on my behalf nothing is personal.
Aminah Richburg
District One Basketball Official

On Monday, February 22, 2016 9:21 AM, Joedy Moots <jmoots@grayca.com> wrote:

Ms Richburg,

I have read the corresponding email from your Director, Rico Williams. I have also reviewed your text to Mr. Williams as well. I have always had respect for our states district directors and the high school league office. Being the officials representative the past four years has been very rewarding to me, but has opened my eyes with even more respect and admiration for both the league and directors. In my real line of work, I am a high school principal and have been in administration for over 20 years. In a way, that is what a director is. The officials in their district are their staff and they are responsible for them. Always dress professional with a clean uniform because you are not only representing yourself, but your district and state as well. I am going to say some things that you are probably not going to like, but if you ask anyone about me, I will always be brutally honest.

As far as Mr. Williams, he is one of the most respected officials and directors in the state. I have never known him as being anything but sincere, honest and professional. I have had disagreements with him myself, but in all my dealings with him, he was professional and respectful. In reading the correspondence from him to you, I feel all his responses were merited. It seems you are having trouble with fellow officials and other schools. It looks to me that Mr. Williams has gone the extra mile to help you advance in your officiating career.

As an administrator, if one of my employees talked about me like you did about Mr. Williams, they would be put on leave for insubordination. I have never seen you work so I cannot comment on your officiating ability but I do want to give you some advice. None of us are in this for the money, we are in it for the love of sport and the love of kids. The game is bigger than us and once we are gone, the game will go on. Get along with your peers and administrators. Be an official that everyone wants to work with and have you on their games. There will always be officials and coaches you don't necessarily like, but they should never know it.

I also agree with Mr. Williams that if you are still serious about officiating, you should try another district, especially after your accusations about your director. Be careful not to burn many bridges in your journey through officiating and life, you never know when you will need to cross one to advance or continue growing.

Best of luck in all you do!

Joedy

On Tue, Feb 16, 2016 at 10:49 AM, aminah richburg <richburga@bellsouth.net> wrote:
You are listed as the Officials Representative please advise on this matter.
Aminah A. Richburg
richburga@bellsouth.net

On Friday, February 5, 2016 12:49 PM, "ericowms@charter.net" <ericowms@charter.net> wrote:

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me. On Wednedsday Feb 3, I left the same message as well as a text. After you subsequently called me back I mentioned to you that the games I scheduled for you to work Thursday, Feb. 4 at Furman's Intramural Program were indeed still on, and I informed you that someone at your last game at Beck Middle School on Feb. 2 had told me that you were officiating with "jogging/workout" type pants that were very tight. If you remember, last year during the JV tournament I asked you to wear your official's pants instead of those "jogging" pants whenever you're representing District One and you said you would. When I asked you was that report accurate from Monday you replied, "I don't wear jogging pants. Is that all?" I then asked you if it was problematic for you with me asking that question and your response

was, "I don't wear jogging pants. I'm at work. Is that all?" I then stated that we talk again soon.

Even though your responses were short, terse and rude I was going to let the matter rest for another day; until after a few minutes you sent me a lengthy text which follows, and I quote: " Please discontinue the harrassing communications. Previous District One leaders presented a higher level of professionalism which made officating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulatesthe District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I weclome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL".

I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked of by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept . 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 1/2 meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1 member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc. it is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route that you deem favorable.

Regards,

E.A."Rico"Williams
Director, District 1
SC Basketball Officials Association
(864 430-9884
Ericowms@charter.net

--
Joedy Moots
Principal
Gray Collegiate Academy
803-951-3321



"Give a man a fish and you feed him for a day; teach a man to fish and you feed him for a lifetime."
Maimonides

Compose Delete Reply Reply All Forward Actions Apply Previous Next

Appellate Exhibit 33 Emails with Appellate and Respondent SCHSL Skip Lax February 9-11, 2016;

You're seeing Basic Mail because you're using an unsupported Internet browser. Upgrade your browser for the full Yahoo experience.
Don't show this again.

Search Mail | Search Web | aminah | Account Info | Go | Sign Out | Home

Inbox | Contacts | Notepad | Calendar

Compose
Delete | Reply | Reply All | Forward | Actions | Apply | Previous | Next

Inbox (2338)
Drafts (7)
Sent
Spam (3) [Empty]
Trash (57) [Empty]

My Folders [Edit]

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Hilton HHonors™ Card
Earn 40,000 Hilton HHonors™ Bonus Points. Apply for

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Re: Information for Official

From: "Skip Lax" <skip@schsl.org>
To: "aminah richburg" <richburga@bellsouth.net>

Full Headers Printable View

Aminah, We do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level.- Sincerely,Skip

Sponsored

Answers
12 Suprising Facts You Never Knew About Good Times

From: "aminah richburg" <richburga@bellsouth.net>
To: skip@schsl.org
Sent: Tuesday, February 9, 2016 4:43:15 PM
Subject: Fw: Information for Official

Mr. Lax, I am forwarding this email message sent by Rico Williams which I believe is highly inappropriate for a District One Director. Mr. Williams did not initiate the call because of a High School League Game, he called to confirm games assigned at Furman University through his business.I confirmed the assigned games through a text message initiated by Mr. Williams the previous week. When I returned Mr. Williams phone call, he stated that the games were still on and I responded ok about the games. then Mr. Williams communicated that someone at my previous game told him I had on sweat pants, then he asked if I wore sweat pants and I told him, "I do not wear sweat pants, Is that all? Then Mr. Williams asked the question, if I had a problem discussing my sweat pants and I repeated, " I do not wear sweat pants, is that all, because I am at work and I need to get off the phone. Mr. Williams responded fine and the conversation ended. Unfortunately the details of our conversation changed with Mr. Williams interpretation in the email he sent to you and several others. I communicated my concerns with a text message to Mr. Williams later because he harassed me and I was obligated to let him know. I now feel that I am being harassed, embarrassed and bullied by Mr. Williams and the email communication he has sent to various individuals proves his lack of professionalism. My meeting attendance has never been a problem with prior leadership or with the current leadership until now. It is true that I attended three meetings this year, I planned to make the fourth meeting, unfortunately, Mr. Williams changed the meeting date and I had a conflict. I met all requirements to officiate basketball games for the SCHL by attending all required meetings. Mr. Williams has shared a lot a damaging information that I did not know concerning my colleagues that have communicated that they did not want to work with me and blocked schools. I know that I blocked CCES and Hillcrest Middle School myself due to personal reasons. If there were any schools that blocked my assignment other than the schools I blocked, I was scheduled that the same schools this year along with some of the same officials. I would like to know the officials that blocked me, it would help me in the future if those same officials officiate other sports. Mr. Williams has his circle of supporters that he has put in leadership positions and many of those individuals character are similar to his. I am an educated professional and sometimes my demeanor may clash with individuals whose behavior is unprofessional and uncouth. Mr. Williams has no legitimate reason to discuss or set parameters towards my participation with the SCHL or District One Board with my continued participation as a basketball official. Furthermore, I would like Mr. Williams to present a detailed list of arrival times for all District One officials for all meetings.I have done nothing out of character. I would like a written apology from Mr. Williams for his lack of professionalism and the pain and suffering he has caused me.

Aminah A. Richburg

On Friday, February 5, 2016 12:49 PM, "ericowms@charter.net" <ericowms@charter.net> wrote:

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me.
On Wednedsday Feb 3, I left the same message as well as a text. After you

Appellate Exhibit 34 South Carolina Basketball Officials Association 2015-2016 Officers, Directors, Commissioner and Officials Representative Listing

SOUTH CAROLINA BASKETBALL OFFICIALS ASSOCIATION

2015 - 2016

OFFICERS

PRESIDENT ..... SIDNEY GRAY
VICE PRESIDENT ..... MARC TINDAL
SECRETARY ..... PAUL BEHR
PAST PRESIDENT ..... SHELDON BOLDS
OFFICIALS REPRESENTATIVE ..... JOEDY MOOTS
COMMISSIONER ..... SKIP LAX

DIRECTORS

DISTRICT 1
Rico Williams
1 Ridgeside Ct
Greenville, SC 29617
(C) 864-430-9884
(H) 864-294-0857
Ericowms@charter.net

DISTRICT 2
Jerome Hall
145 Westmeath Drive
Moore, SC 29369
(H) 864-595-1609
(C) 864-590-4741
thall1609@charter.net

DISTRICT 3
Paul Behr
1080 Saddle Drive
York, SC 29745
(H) 803-628-4279
(C) 803-517-3884
pbehr@district3hoops.com

DISTRICT 4
Gene Simmons
P.O. Box 492
Clinton, SC 29325
(H) 864-833-3688
(W) 864-833-1555
(C) 8640200-5007
gsimmons@clintonymca.org

DISTRICT 5
Richie Jeffcoat
341 Fallen Timber Trail
Blythewood, SC 29016
803-333-4288 (W)
803-727-3921 (C)
803-834-4112 (H)
rjeffcoa@csc.com

DISTRICT 6
Marc Tindal
PO Box 1307
Manning, SC 29102
(C) 843-992-5086

(H) 843-479-5356
matindal@yahoo.com

DISTRICT 7
Leon Myers
PO Box 7431 SCSU
Orangeburg, SC 29117
(H) 803-536-5575
(W) 803-536-8684
(C) 803-378-3113
lmyers7@scsu.edu

DISTRICT 8
Sheldon Bolds
73 Kendall Drive
Bluffton, SC 29910
843-757-8779 (H)
843-290-7871 (C)
boldsx4@hargray.com

DISTRICT 9
Granderson James
P O Box 3015
Sumter, SC 29151

(C) 803-968-2391
grandersj@aol.com

DISTRICT 10
Rosco Campbell
106 Kennedy Lane
Piedmont, SC 29673
(H) 864-220-0635
(W) 864-403-2100
(C)864-908-0991
rcampbel@anderson4.k12.sc.us

DISTRICT 11
Jake Rosiek
4734 Southern Trail
Myrtle Beach, SC 29579
(C) 843-503-2600
(W) 843-349-2800

jake.rosiek@gmail.com

DISTRICT 12
Sidney Gray
433 Jehossee Drive
Aiken, SC 29801
803-648-2761 (C)
803-502-8146 (W)
803-648-2761 (H)
ls1gray@aol.com

COMMISSIONER
Skip Lax
PO Box 211575
Columbia, SC 29221
(H) 803-359-7121
(W) 803-798-0120
skip@schsl.org

OFFICIALS REPRESENTATIVE
Joedy Moots
141 Switch Grass Dr
Leesville, SC 29070
(H) 803-896-3527
(C) 803-521-0720
jmoots@grayca.com

CONSTITUTION

Article I NAME

This organization shall be known as the South Carolina Basketball Officials Association (SCBOA).

Article II PURPOSE

A. The training and development of basketball officials.
B. The maintenance of a booking office for high schools, prep schools, and others desiring our services.

Article III DISTRICTS

The territory embracing the residence of members shall be divided into eight or more districts as stated in the By-Laws.

Article IV OFFICERS AND DIRECTORS

A. The officers of the Association shall be one president, one vice president, and one secretary.
B. The directors shall be fifteen in number, to-wit: three officers, the nine directors without office, the Commissioner, the Executive Director of the South Carolina High School League, and the immediate past president of the Association, who shall be an ex-officio director for one year.

Article V ELECTIONS

A. The president and vice president shall be elected annually by the board of directors at a regular meeting of the board. The presidency shall be alternated between the upper and lower state. The upper state districts shall be districts 1, 2, 3, 4 and 10. The lower state districts shall be 5, 6, 7, 8, 9, 11 and 12.
B. All districts shall be entitled to representation on the board of directors through the election to the board of one member from each district.
C. No district shall be entitled to have more than one member from that district serving on the board of directors at any time, except the immediate past president of the Association serving as an ex-officio director as provided in Article IV.
D. To hold the office of president or vice president, one must have been a certified basketball official in South Carolina for a period of at least four years.
E. To hold the office of district director, one must be a certified official in the Association during each year of his term of office.

Article VI BOARD OF DIRECTORS

A. The board of directors shall act in an advisory capacity to the president; shall entertain and cause to be thoroughly investigated written complaints against any member of the Association and shall take what action it may deem advisable.
B. The board of directors shall have full power to adopt all regulations to govern its deliberations.
C. The board of directors shall determine eligibility tests on applicants for membership.

Article VII GENERAL

The qualifications for membership and the duties of officers and directors, and regulations as may be necessary and proper for the conduction of business and affairs of the Association shall be provided in the By-Laws.

Article VIII AMENDMENTS TO THE CONSTITUTION

The constitution may be amended at the annual meeting by an affirmative vote of three-fourths of the votes cast, or by mail ballot of three-fourths of the votes cast, provided that copies of the amendment have been mailed to each member at least 30 days prior to the time the vote is taken.

Appellate Exhibit 36 SCBOA 2015-2016 By-Laws; SCHSL 081-100;

BY-LAWS

Article I THE PRESIDENT

The President shall preside at all meetings of the Association and the Board of Directors. He may vote as a district director. He shall conduct all business on behalf of the association and shall make every effort to further the policy adopted by the association.

Article II THE VICE PRESIDENT

The vice president shall perform the duties of the president in his absence or inability to act.

Article III THE SECRETARY

The secretary shall keep the minutes of all meetings of the Association.

Article III A THE DIRECTOR

The director is a representative of one of the twelve geographical districts. The director has full power of office, i. e., the director may vote, make motions, speak for or against items of agenda, and must be present to cast a vote on behalf of the district. Any district not represented by its duly elected director may be represented by a substitute or supply director appointed by the director. Such appointment shall be in writing, dated and signed by the director. The substitute will have full power of office, i. e., the substitute may vote, make motions, speak for or against items of agenda.

Article IV THE COMMISSIONER OF OFFICIALS

A. The Executive Committee of the South Carolina High School League shall appoint the Commissioner of Officials. He shall have charge of all records pertaining to the business of the Association.

B. The Commissioner shall receive all applications for membership, which have been approved or disapproved by the director of the district where the applicant resides and the Commissioner shall notify the applicant of the approval or rejection of his application. If the applicant is approved for membership, the Commissioner shall furnish the applicant with a copy of the Constitution, By-Laws, and booking office regulations.

C. The Commissioner shall maintain in his office all reports and records of the members of the Association and the record of an official shall be available to such official at such reasonable time as may be agreed upon by the individual and the Commissioner.

D. The Commissioner shall keep a record of all game assignments and schedules of member schools and shall, upon request of the athletic director or coach of a school, furnish to such school a list of all officials, together with information, which in the opinion of the Commissioner might be relevant in making an impartial and proper selection of game officials.

E. The Commissioner shall furnish each member school a list of the officials.

Article V DISTRICTS

The territory embracing residences of members shall be divided into districts as follows:

1. Greenville and Pickens	7. Allendale, Bamberg, Barnwell, Calhoun, Hampton, and Orangeburg
2. Cherokee, Spartanburg, and Union	8. Beaufort, Berkeley, Charleston, Colleton, Dorchester, and Jasper
3. Chester, Fairfield, Lancaster, and York	9. Clarendon, Kershaw, Lee, and Sumter
4. Abbeville, Greenwood, Laurens, McCormick, Newberry, and Saluda	10. Anderson and Oconee
5. Lexington, Richland	11. Georgetown, Horry, and Williamsburg
6. Chesterfield, Darlington, Dillon, Florence Marion and Marlboro	12. Aiken and Edgefield

Article VI ELECTION OF DIRECTORS

The members of the district at a regular district meeting shall elect the director for each district. Proper notice shall be given to all members of the district notifying them of the date elections are to be held. Such notice shall be given at least two weeks before the date of the election. Directors shall be elected so that they will be rotated on a three-year basis. Districts 1, 4, 7, and 10 will be elected one year. Districts 2, 5, and 8 will be elected the next year and districts 3, 6, 9, 11 & 12 the third year.

Should a director be unable to complete his term, a new director will be elected to replace him from that district and the director so elected will serve for three years. Any director, when elected, will serve three full years even though this may alter the rotation system above.

The President, Vice-President and Secretary shall take office on July 1st and their terms shall end the following June 30th. Likewise newly elected District Directors shall take office on July 1st and their terms shall end on June 30th, three years later.

Elections for Vice-President and Secretary shall take place at the March BOD meeting.

The Board of Directors shall meet quarterly to conduct the business of the SCBOA. (This is normally the second Monday in July, the first Monday in October, the second Monday in January, and the Saturday morning of the State Finals.)

Article VII MEMBERSHIP

A. A membership year shall begin on April 1 and end on the same date the next year following.
B. Annual membership dues shall be computed as follows: $10 for the association plus a fee charged by the South Carolina High School League which covers administrative costs, books, membership in the NFOA and NFOA insurance. This fee shall be set each season by the SCHSL.
C. The deadline for submitting renewal applications shall be March 31st. In addition, the Official Peer Rating is due by March 31st. Renewal applications postmarked after March 31st shall be considered late. A late fee of $30 shall be charged and a **one** point rating deduction shall be assessed. Applications will not be processed until all monies owed are received.
D. If a basketball official is also a member of the South Carolina Football Officials Association, he is a member of NFOA and may deduct the NFOA insurance fee from the above fees. Dues will be paid directly to the South Carolina Basketball Officials Association.

E. October 15th shall be the cutoff date for accepting any applications, with the exception of transfer-ins.

F. The director and the district's local review board shall review all officials who are members of the district and are members of the South Carolina Basketball Officials Association for the first or second year. The director and the review board will be authorized to reject the renewal application of any first or second year official if they feel that it is in the best interest of the Association.

G. An official with 3 through 6 years experience and a rating below 75 or an official with 7 years or more and a rating below 85 will be placed on probation for 1 year. If this condition should exist a second time, the official may be dropped from the Association.

Article VIII OFFICIAL'S FEES

Deleted

Article IX GENERAL RULES OF CONDUCT

A. No member shall accept any in-state high school engagement unless the Association headquarters in Columbia assigns him. The district director may make assignments to non-member schools, Junior Varsity, B-team and middle schools regular season games.

B. Any member who violates the provisions of the constitution and by-laws may be suspended for such length of time, as the board of directors of this Association may deem wise and proper.

Article X DISCIPLINE OF OFFICIALS

Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors.

Article XI UNIFORMS

A. Each official shall have a complete standard uniform, which shall be as follows:
   1. Black and white vertically striped v-neck short sleeve knit shirt. Straight leg black trousers without cuffs. (Trousers may be pleated or plain.)
   2. Black officials shoes (if low cut shoes are worn, officials must wear black socks). A black shoe with a white trim may be worn if all officials wear them.
   3. Black jacket made of wool or nylon, without a hood, and with or without a waistband.

B. The SCBOA or any district may, as a memorial, place a patch or band on their left shirt sleeve for a period of one year, for each memorial situation.

Article XII OFFICIATING MECHANICS

All members shall conform to the mechanics and procedures prescribed in the officials' manual published by the National Federation of State High School Associations.

Article XIII CANCELLATIONS AND POSTPONEMENTS

Deleted.

Article XIV RESPONSIBILITIES OF OFFICIALS

A. Any official who fails to fill his appointment will pay the home school the amount of the fee that he was to receive.

B. The Referee shall contact their crew in advance of the assignment.

C. Any official who does not accept his/her assignments by ArbiterSports.com's Accept-by date will be replaced.

D. Any official that declines an assignment less than 14 days before an assignment (and he had not previously been released on that date) or accepts an assignment and then turns the game back to the booking office less than 14 days before the assignment, shall have one point deducted from cooperation under the rating system, except in case of extreme emergency. (To be determined by the Board of Directors)

E. Releases for dates other than those listed in the release form sent in before the season starts must be obtained at least three days before the assignments leave the booking office.

F. Collect telephone calls to the booking office by any official will be refused unless previously authorized by the booking office. Directors making required calls to the league office might be reimbursed for these calls provided that they furnish a verification of the calls at the end of the season.

G. Grooming standards shall be as follows:

1. No hair shall touch the shirt collar or extend over the ear
2. No sideburns below the lowest part of the ear lobe.
3. No facial-hair other than a neatly trimmed mustache, which shall not extend lower than the edges of the mouth.

Article XV PHYSICAL EXAMINATION

Officials are required to have an annual physical.

If the official meets the physical requirements for officiating, the physician will sign the following: "I have examined the official and find that he meets the physical requirements for activities as a basketball official." The Association will accept its own form, any other physical form with the above statement or the above statement properly signed on any form or letter.

By the scheduled date of the officials' examination, each district director will turn in to the booking office the required physical form.

Officials who do not turn in their physical forms on or before the date of the exam will have a **one** point rating deduction and will not be assigned until after January 1st.

No physical forms will be accepted after the second Monday following the regularly scheduled statewide exam and any official who has not turned in a physical by then will be dropped from the Association.

Article XVI RULES CLINICS / WRITTEN EXAMINATION

A. The League will conduct six basketball rules clinics. It is mandatory that all basketball officials attend one of these clinics.

B. To be certified, each official must take a written examination on rules and mechanics.

C. Officials who are members of the South Carolina Basketball Officials Association for the first year do not have to make a passing grade on the examination.

D. Officials who have been members of the South Carolina Basketball Officials Association for one or more years must score 70 or above on the examination. If any such official scores less than 70, he will be required to study and then take another exam prior to December 15. The officials must make 70 or above on the second try to be eligible for assignments to varsity games.

E. Officials shall be required to take the written examination on rules and mechanics on the scheduled date. Officials who do not take the written examination on the scheduled date must take a make-up exam.

F. The last date to take the exam is the second Monday following the statewide exam. If an official takes the makeup exam on the Monday following the statewide exam, they will be fined **$25.00** and have **two** points deducted from their officials rating. If they take the makeup exam anytime between Tuesday and the following Monday (second Monday following the statewide exam), they shall be fined **$25.00** and have an **additional two** points (for a total of four) deducted from their officials rating. Officials who have not taken the exam by the second Monday following the statewide exam shall be dropped from the Association.

   a. One point will be deducted from the officials rating for failure to attend a statewide clinic.

Article XVII REVIEW BOARDS

A. A local review board of not less than three officials shall be appointed by each director. The duties and responsibilities of the board shall be as follows:

   1. Each year the local review board and the district director shall review the records of all officials in the district with one or two year's experience in the Association in accordance with Article VII.
   2. The local review board shall review the records of any new applicant in the district, who has acceptable experience in other states, or who was a former member of the South Carolina Basketball Officials Association but who does not have a rating. An appropriate rating for booking purposes shall be assigned to such official by this board.
   3. The local review board shall also review the records of any member with two or more years experience that may be referred to the board by the district director or the Commissioner of officials. The board may adjust the rating of such official either upward or downward or may recommend that the official be dropped from the Association.

B. A state review board of not less than five officials, selected from the Board of Directors, shall be appointed by the President. The purpose of this board will be to hear any appeals from the local review boards.

Article XVIII RATING SYSTEM

A. The officials rating used by the SCHSL in making game assignments shall be by the following rating system.

Credit Factors	Written Examination	SCBOA Credit	Officials Rating	Clinics, Exam, Training	Cooperation	Total
Maximum Points	25	25	25	20	5	100

Actual points earned are computed as follows:

Written Examination 25 times the percentage grade.

SCBOA Credit 5 points for each year of certified experience for the first five years. (Experience in other states must be confirmed in writing by the athletic association of the state in which the official was certified.)

Officials Peer Rating Ratings are submitted on a scale of 1 to 10. The average is computed and multiplied by 2.5.

Clinics, Exam & Training 20 points are earned as follows:
One point for attending an SCHSL-sponsored clinic.
Two points for attending the SCBOA exam.
One point for each of six classroom clinics prior to the season.
One point for each of two classroom clinics after the start of the season.
One point for each of two inter-school scrimmages assigned by the district director.
One point for each of two classroom clinics and/or scrimmages.
Five points for future use*

Cooperation Deduction of points are determined by the Commissioner and/or the district director. The district director may deduct up to two points.

* - All officials will receive the five points until such points are designated for specific activities

B. For District Directors, the Officials Peer Rating during their term of office shall be the higher of the following; the peer rating they came into office with or the calculated peer rating for each year.

C. Rating Adjustments for Officials.

- By a District's Local Review Board
  Can only adjust up ratings based on available experience points. If an official has not maxed out on "Experience" points, his district's local review board may adjust up an official's rating, by utilizing the available unearned experience points. Once adjusted up, it stays up (no need to re-up their rating each year). Also a point can be earned for attending a qualifying officiating camp (once earned, it stays).

- By the SCBOA Board of Directors
  All other adjustments to an official's rating, when their "Experience" points are maxed out, can only be made thru the Board of Directors.

D. An official who takes the exam, but does not officiate that season shall have their rating set by taking their previous year's rating and substituting the lower of the two exam scores (current year vs previous year) to calculate their rating for next season.

Article XIX RATING APPEAL POLICY

Deleted.

Article XX BOOKING REGULATIONS

Deleted.

Article XXI VARSITY OFFICIATING CREW STAFFING PROCEDURE

Deleted

Article XXII SCBOA BASKETBALL OFFICIALS CAMP

A. The SCBOA in partnership with the SCHSL shall develop and conduct a summer Basketball Officiating Development Camp program.

B. Deleted

C. The Camp Committee, whose members are to be designated by the Board of Directors, is granted authority to approve other camps that may serve as an acceptable qualifying substitute. Other camps that teach high school rules and mechanics can be considered for approval.

Article XXIII BY-LAW EXCEPTIONS

For an individual exception to the By-Laws, a District Director shall contact the SCBOA President. The President may, at his discretion, present the exception request to all the other Directors (in the interim between BOD meetings). If the exception request receives a two-thirds affirmative vote, the exception is approved and the President shall forward the approved exception on to the Commissioner of Officials.

SC/NC ALLSTAR GAME OFFICIALS - DISTRICT ROTATION

Year	Districts	Type of Game
1998	6, 8, 5	Boys
1999	11, 3, 4	Girls
2000	7, 2, 1	Boys
2001	12, 9, 10	Girls
2002	12, 9, 10	Boys
2003	6, 8, 5	Girls
2004	11, 3, 4	Boys
2005	7, 2, 1	Girls
2006	7, 2, 1	Boys
2007	12, 9, 10	Girls
2008	6, 8, 5	Boys
2009	11, 3, 4	Girls
2010	11, 3, 4	Boys
2011	7, 2, 1	Girls
2012	12, 9, 10	Boys

2013	6, 8, 5	Girls
2014	6, 8, 5	Boys
2015	11, 3, 4	Girls
2016	7, 2, 1	Boys
2017	12, 9, 10	Girls
2018	12, 9, 10	Boys
2019	6, 8, 5	Girls
2020	11, 3, 4	Boys
2021	7, 2, 1	Girls
2022	7, 2, 1	Boys
2023	12, 9, 10	Girls
2024	6, 8, 5	Boys
2025	11, 3, 4	Girls
2026	11, 3, 4	Boys
2027	7, 2, 1	Girls
2028	12, 9, 10	Boys
2029	6, 8, 5	Girls

SOUTH CAROLINA EXCEPTIONS TO NFHS RULES

TIMING OF BASKETBALL GAMES

This supersedes Rule 5, Section 5 for JV and "B" games

All games must start at their scheduled times. If two varsity games are being played, the first game must start no later than 7:00 P.M. The second game will begin within 20 minutes after the conclusion of the first game.

Overtime periods for all games played in quarters of less than eight minutes will be three minutes each.

All JV, "B", junior high school or middle school games will be played in four quarters of six minutes each with intermissions of one minute after first and third quarters and eight minutes between halves.

These three sections supplement Rule 1, Section 18

a. The principal of the host school will prohibit the use of loud noisemakers, i.e. cowbell, air horns, radios and musical instruments. The tournament director will forbid noisemakers during tournament play.

b. Cheerleaders must be in the bleachers except during full time-outs, end of quarters and half time. Mascots are considered cheerleaders. Megaphones for cheering purposes will be used only by cheerleaders. Jewelry will not be worn at any time. **Each school is responsible for enforcement of these regulations.**

c. Pep bands or musical entertainment may be permitted prior to the game, during halftime or following the game. Under no circumstances will any musical instruments be used at any other time.

FEES, PRACTICES & PROCEDURES

DUES & FEES

The current administrative fee charged by the South Carolina High School for rule books, case books, officiating manuals, NFOA membership and insurance and to operate the booking office is $45. When added with the $10 dues for the SCBOA the total amount is $55. If an official decides not to be a member of SCBOA for the current year after having paid the dues and fees, a refund of 50% of the dues and fees paid will be made if notification is received before October 15th of the current year. After October 15th of the current year, no refund will be given.

OFFICIALS FEES

Officials' fees for games shall be as follows:

Single Middle School (R & U)	Two Middle School (R & U)	Single JV Game (R & U)	Two JV Games (R & U)	Single Varsity Game (R, U1 & U2)	Two Varsity Games (R, U1 & U2)	State Play-Off Game (R, U1 & U2)	Two State Play-Off Games (R, U1 & U2)	State Final Game (R, U1 & U2)
$32.00	$46.00	$37.00	$55.00	$55.00	$78.00	$62.00	$85.00	$78.00

A. Conference, regional or invitational tournament game fees will be the same as column one, if the official is assigned one game or column two, if the official is assigned two games.

B. Play-off fees plus mileage apply after regional play.

C. Travel allowance for all games shall be 0.45 per mile to each official with a minimum of $9.00.

D. Officials will be furnished for the coach's association all-star games without fee, but with travel and room expenses.

CANCELLATIONS AND POSTPONEMENTS

For any game cancelled or postponed, the home team is responsible for notifying the officials assigned to the game and the booking office. If the home school fails to notify any official assigned to the game that has been postponed and the official travels to the game site, the home school shall pay each official mileage for travel actually performed (plus the game fee, if the game is cancelled).

BOOKING REGULATIONS

A. **General**

Three officials will be used in all varsity games booked by this Association. Fees and travel shall be paid in accordance with the schedule above and that listed in the High School League handbook.

A school may submit a mark-off list of not more than eight (8) officials. Officials on this list will not be assigned to any basketball game of that school. No more than 8 officials may be on a mark-off list at any given time.

When there is a problem of an official being on too many mark-off lists, the Commissioner shall scout the official, investigate, and take any action that he deems necessary.

All games on a given date will be arranged in numerical order according to anticipated importance, rivalry, relative bearing on conference standing, and other similar factors.

When priority of games has been established, the booking office will begin making

assignments with the game of most priority and will continue in numerical order until all games have been assigned.

Officials may turnback assignments without penalty if done via email (or in writing) 14 or more days prior to the assignment.

An official assigned to a game and later rejected by one of the competing schools, with less than 14 days notice, will be paid his fee by the rejecting school. If assigned to another game, the rejecting school must make up any difference in fee.

Officials certified by the high school league must be used in all varsity games. The League office will not book any regular season games below the varsity level.

Unnecessary mileage restrictions by officials shall cause the booking office to restrict assignments to that official. Officials having travel and time restrictions (after 5 p.m.) will be given last consideration in booking.

Any time restriction and/or mileage restriction, which has been in effect for more than one-half of the regular season, shall also be in effect for tournaments.

The Commissioner reserves the right to revise the above regulations in case of emergency.

Directors may charge a reasonable booking fee for the booking of JV, "B" Team, Jr. High, & Middle School games.

B. **Pre-Season & Holiday Tournaments**

The local director will assign officials for all pre-season and Christmas tournaments, JV, "B" team, Jr. High and Middle School tournaments.

C. **Regular Season**

Officials shall be limited to two SCHSL regularly booked varsity assignments per week, during the regular season.

D. **Playoffs, Conference Tournaments & State Tournament Officials**

An official must have worked at least 10 varsity assignments, booked by the SCHSL, in order to be eligible for playoff assignments.

There shall be no limit to the number of assignments an official may have per week during the playoffs.

The booking office will assign officials to all regional and conference basketball tournaments. Tournament directors may inform the booking office of no more than 6 officials that they prefer not to have.

For the State Tournament the Commissioner will make up a list of eligible officials. This list will be composed of the top 20 percent by rating of each of the 12 districts as well as the top 20 percent in the state. This list will be used to assign officials to each tournament.

State play-off finals shall be restricted to one final game for any one official.

Starting with the 2010 State Finals, no official may work more than two consecutive state finals.

VARSITY OFFICIATING CREW STAFFING PROCEDURE

In order to ensure full officiating crew at JV & Varsity games, the following procedure has been adopted.

A. The varsity crew should "pitch-in", if when they arrive and find the JV game being

officiated by one official.

B. The Junior Varsity (JV) officiating crew should remain at the game site until the full varsity crew has arrived.
C. The Referee of the varsity game may decide to use one (or two) of the officials working the JV game, provided the official(s) is certified by the SCHSL.
D. The Referee may decide to work a two man crew (or wait on the full varsity crew).

RATING APPEAL POLICY

All appeals must be in writing and include a copy of the official's rating slip. Appeals must indicate number of points deducted and how many are being appealed.

All appeals for work related reasons should be on company letterhead and from/signed by the individual's manager with the address and phone number of the manager/supervisor included.

All other appeals should also be on letterhead and/or include supporting documentation from the responsible individual (e.g., Physician, Jury Foreman/Judge, County/City Council, Law Enforcement, Military, Wedding or Funeral notice, etc).

All other appeals (late applications, turned in games, etc) should be turned in to their director as soon as possible after the incident, but in no circumstances later than June 1st.

All appeals will be made to the district director with the supporting documentation no later than May 15th. The director will then review the information and inform the member of his decision by May 22nd. If the decision is not favorable the member may appeal to the local appeals board which will render a decision by June 1st. If he does not receive a favorable appeal he may then appeal to the Board of Directors. All appeals to the Board of Directors should be sent to the BOD secretary no later than June 15th, in order to review them at the July meeting. The decision of the Board of Directors is final.

At least 2 weeks prior to the July meeting the BOD Secretary will send copies of all the appeals to the BOD to:

- The SCBOA BOD, in order to provide time for the BOD to prepare for the appeals meeting (why points were deducted, etc); and
- To each director, in order to allow time for review by each director and if there are questions, it would allow time for the questioning director to get clarification or more information from the appealee's director prior to the meeting.

All appeal votes shall be by closed ballot.

The following are excerpts taken from the South Carolina High School League Handbook

CONTEST SCHEDULED STARTING TIME

Coaches of all high school sports are requested to organize their program so that their athletic contests start at the scheduled time. Officials have been requested to be at the game in advance of the starting time.

Preliminary ceremonies are an important part of the school activity program and the coach should work with others connected with this program to see that their activities are concluded in time for the game to start as scheduled and advertised.

Varsity – JV game time conflict. Game management shall make the call whether to continue the JV contest or shorten the game. In the event that the varsity games start later than the prescribed limits above, the varsity game(s) shall be played and the matter reported to the SCHSL for their review.

CANCELING OR POSTPONING A BASKETBALL GAME

Instructions for canceling or postponing a basketball game are as follows:

1. Notify the officials assigned to the game and inform them of the date on which the game will be made up. If the home school fails to notify an official assigned to the game and the official travels to the site, the official will be paid mileage for travel performed plus the game fee.
2. Notify the league office and be prepared to inform the league that that all officials have been notified. Also inform the league whether the assigned officials will accept the game on the rescheduled date.

RESPONSIBILITIES OF THE SCHOOL

If a member school fails to furnish adequate police protection for the officials, said school is immediately placed on probation until an investigation can be made by the officials association and the South Carolina High School League. An official must report any irregular procedure of the game or any unusual conduct on the part of the crowd, coaches, school officials or students to the Executive Director of the South Carolina High School League.

Also, schools are required to provide a private meeting room for the officials prior to the games and during the intermission between games.

RESPONSIBILITIES OF THE COACH

The coach bears the greatest burden of responsibility for sportsmanship. His influence upon the attitudes and behavior of the players, the student body, and the community are unequaled. In order for good sportsmanship to become reality, it is essential that the coaches subscribe to the values of sportsmanship and teach its principles through word and deed. Coaches should:

- Always set a good example for others to follow.
- Instruct players in sportsmanship.
- Discipline students who display unsportsmanlike behavior.
- Respect the officials' judgment and interpretation of the rules.
- Be a good host to opponents.

RESPONSIBILITIES OF THE OFFICIALS

Officials should:

- Maintain a neat appearance, and be friendly but businesslike.
- Know fully the rules and accepted officiating procedures.
- Make decisions promptly, fairly, and without arrogance.
- Be consistent.
- Eliminate showboating in officiating.
- Be on time and start the game on time.
- Refrain from placing hands on players during an athletic contest.
- Work together with other officials. A pre-game conference prior to each game is a must.

POLICY, COACH-OFFICIAL RELATIONSHIP

The League's policy concerning the ethical relationship between coach and official during and immediately following an interscholastic contest is that once officials are assigned they are entitled to the active support of the coaches. Under no circumstances shall a coach attempt to publicly criticize, berate or intimidate an official.

Officials are expected to arrive on time at each game site, neatly dressed in the designated uniform. Officials should be in good physical condition, mentally ready to work the best possible game and fully cognizant of the playing rules. They are expected to hustle and to call each play as they see it without fear or favor, regardless of the score.

Officials are instructed to correct all errors if errors are made provided that they are correctable. Judgment calls on the part of officials are not subject to question or discussion. Officials are instructed to refrain from discussing judgment calls with coaches, players, or spectators.

Coaches and officials are expected to treat each other with courtesy, dignity and respect. Each should treat the other as he expects to be treated. These provisions should be carefully studied and followed.

Officials are advised that they should leave the basketball court as soon as possible following the completion of the game. This may save post-game arguments and protect those concerned from making a statement they might regret later.

REPORTING DISQUALIFICATIONS

League regulations require that officials report all disqualifications (player and coach). The player's number, school and the reason for the disqualification must be reported. It is not necessary to list the jersey color.

DISCIPLINE OF OFFICIALS

Officials associations may set up rules and regulations for the discipline of its members. The legislative assembly of the South Carolina High School League is of the opinion that the final authority of discipline for both schoolmen and athletic game officials must be centralized and that this centralized authority will be the Executive Director of the league. The Executive Director has the authority to discipline the official in one or more of the following manners:

Warning - this is an official notice that an inexcusable, unethical or unsportsmanlike action is a matter of record and must not happen again.

Probation - this is a more severe type of warning. An official on probation may be assigned to regularly scheduled games but he will not be assigned to a play-off game for a conference championship, a play-off game toward the state championship or a tournament of any type.

Suspension - a suspended official may not work an interscholastic athletic contest of any kind for a member of the South Carolina High School League or a school that is a member of another

state associated with the National Federation of State High School Athletic Associations.

Fine - a fine may be levied separately or in addition to a warning, probation or suspension. It will be levied against the official and may range from the fee received for working the game up to a maximum of $100.00. Any disciplinary action by SCBOA or the Executive Director may be appealed to the Executive Committee of the High School League.

OFFICIALS LIABILITY INSURANCE

Liability insurance is covered under NFOA membership. (Up to one million dollars individual liability protection from suits arising from officiating duties and paying for legal fees as well as any assessments or damage awards.) Medical coverage is available through the national federation office.

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Appellate Exhibit 2016CP2302113 Motions/Fees;

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Aminah A Richburg vs. E A Rico Williams , defendant, et al

Case Number:	2016CP2302113	Court Agency:	Greenville County Common Pleas	Filed Date:	03/31/2016
Case Type:	Common Pleas	Case Sub Type:	Slander/Libel 380	File Type:	Jury
Status:	Dismissed	Assigned Judge:			
Disposition:	Dismissed by Court - not Rule 40J	Disposition Date:	04/19/2017	Disposition Judge:	Gravely, Perry H.
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials

Click the icon to show associated parties.

Name	Address	Race	Sex	Year Of Birth	Party Type	Party Status	Last Updated
Hurley, Sarah Day	PO Box 1509 Greenville SC 29602				Defendant Attorney		08/03/2016
Laffitte, Rebecca	PO Box 11449 Columbia SC 29211				Defendant Attorney		05/04/2016
Montgomery, John Michael	PO Box 11449 Columbia SC 29211				Defendant Attorney		08/03/2016
Richburg, Aminah A	217 Plum Creek Lane Greenville SC 29607				Plaintiff		04/19/2017
Richburg, Aminah A	217 Plum Creek Lane Greenville SC 29607				Plaintiff Pro Se		04/10/2017
Ruff, Harley Delleney	17 Professional Village Cir. Beaufort SC 29907				Alternate Mediator		03/09/2017
South Carolina High School League					Defendant		04/19/2017
Williams, E A Rico					Defendant		02/24/2017
Willson, Harold J. Jr.	872 S. Pleasantburg Dr. Greenville SC 29607				Mediator		03/09/2017

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Greenville County
13th Judicial Circuit
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Switch View

Aminah A Richburg vs. E A Rico Williams , defendant, et al

Case Number:	2016CP2302113	Court Agency:	Greenville County Common Pleas	Filed Date:	03/31/2016
Case Type:	Common Pleas	Case Sub Type:	Slander/Libel 380	File Type:	Jury
Status:	Dismissed	Assigned Judge:			
Disposition:	Dismissed by Court - not Rule 40J	Disposition Date:	04/19/2017	Disposition Judge:	Gravely, Perry H.
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials

Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Richburg, Aminah A	ADR/Notice of ADR	Action		06/07/2017-14:43	04/19/2017-14:43	
Richburg, Aminah A	Certificate Of Service	Filing		04/25/2017-16:01		
Richburg, Aminah A	Brief in Upholding PLT Motion To Compel/Opp to Def Motion	Filing		04/25/2017-16:00		
Richburg, Aminah A	Memo/Memo in Support To Dismiss Motion Summary Judg	Filing		04/25/2017-16:00		
Richburg, Aminah A	Memo/Memo in Support To Dismiss C High School Leagues Opp	Filing		04/25/2017-15:59		
Richburg, Aminah A	Filing/Of Request For Admission	Filing		04/25/2017-15:59		
Williams, E A Rico	Order/Form 4/Granting Defs SJ Motion	Order		04/19/2017-09:06	04/19/2017-09:06	
Richburg, Aminah A	8/7/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		04/06/2017-14:36	04/19/2017-14:36	
Hurley, Sarah Day	8/7/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		04/06/2017-14:36	04/19/2017-14:36	
Laffitte, Rebecca	8/7/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		04/06/2017-14:36	04/19/2017-14:36	
Montgomery, John Michael	8/7/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		04/06/2017-14:36	04/19/2017-14:36	
Williams, E A Rico	Certificate of Service	Filing		03/20/2017-16:19	04/19/2017-16:19	
Williams, E A Rico	Memo/Memo in Support	Filing		03/20/2017-11:32	04/19/2017-11:32	
South Carolina High School League	Memo In Opposition to Plt's Motion to Compel & In Support of	Filing		03/16/2017-18:38	04/19/2017-18:38	
South Carolina	Certificate of Service	Filing		03/16/2017-18:38	04/19/2017-18:38	

High School League						
Williams, E A Rico	Filing/Defendant E A Rico Williams Brief In Opposition	Filing		03/13/2017-16:00	04/19/2017-16:00	
Williams, E A Rico	Certificate/Certificate	Filing		03/13/2017-16:00	04/19/2017-16:00	
Richburg, Aminah A	Archived Document	Filing		03/09/2017-00:00	04/19/2017-00:00	
Richburg, Aminah A	Plt/Motion/Dismiss Motion & Dismiss Summary Judgment	Motion		03/06/2017-11:26	04/19/2017-11:26	
Richburg, Aminah A	Challenge the Reliability & Vailidity of Aff of Def Williams	Filing		03/06/2017-09:51	04/19/2017-09:51	
Richburg, Aminah A	Challenge the Reliability & Vailidity of Aff of Def Skip Lax	Filing		03/06/2017-09:40	04/19/2017-09:40	
Montgomery, John Michael	3/9/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		03/01/2017-08:52	04/19/2017-08:52	
Hurley, Sarah Day	3/9/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		03/01/2017-08:52	04/19/2017-08:52	
Laffitte, Rebecca	3/9/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		03/01/2017-08:52	04/19/2017-08:52	
Richburg, Aminah A	3/9/2017_JT_Roster/Notice of Case Roster Publication Sent	Action		03/01/2017-08:52	04/19/2017-08:52	
Montgomery, John Michael	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/28/2017-13:04	04/19/2017-13:04	
Laffitte, Rebecca	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/28/2017-13:04	04/19/2017-13:04	
Hurley, Sarah Day	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/28/2017-13:04	04/19/2017-13:04	
Richburg, Aminah A	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/28/2017-13:04	04/19/2017-13:04	
South Carolina High School League	Service/Certificate Of Service	Filing		02/27/2017-15:29	04/19/2017-15:29	
South Carolina High School League	Def/SC High School League Motion/Summary Judgment	Motion		02/27/2017-15:29	03/20/2017-15:29	
Richburg, Aminah A	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/24/2017-16:34	04/19/2017-16:34	
Hurley, Sarah Day	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/24/2017-16:34	04/19/2017-16:34	
Laffitte, Rebecca	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/24/2017-16:34	04/19/2017-16:34	
Montgomery, John Michael	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		02/24/2017-16:34	04/19/2017-16:34	
Williams, E A Rico	Certificate Of Serv of Aminah A Richburg & John M Montgomery	Filing		02/24/2017-15:03	04/19/2017-15:03	
Williams, E A Rico	Def/E A Rico Williams Motion/Summary Judgment	Motion		02/24/2017-15:03	03/20/2017-15:03	
Richburg, Aminah A	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		01/26/2017-13:27	04/19/2017-13:27	
Montgomery, John Michael	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		01/26/2017-13:27	04/19/2017-13:27	
Laffitte, Rebecca	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		01/26/2017-13:27	04/19/2017-13:27	
Hurley, Sarah Day	3/20/2017_MOTION_Roster/Notice of Motions Roster Publication	Action		01/26/2017-13:27	04/19/2017-13:27	
Richburg, Aminah A	Certificate Of Service of Memorandum	Filing		01/18/2017-15:51	04/19/2017-15:51	
Richburg, Aminah A	Plt Memo in Support Of Motion To Dismiss Protective Order	Filing		01/18/2017-15:51	04/19/2017-15:51	

Richburg, Aminah A	March 9, 2017 Status Conf. Roster 9:00 am. Courtroom 8	Action		01/18/2017-09:40	04/19/2017-09:40	
Laffitte, Rebecca	March 9, 2017 Status Conf. Roster 9:00 am. Courtroom 8	Action		01/18/2017-09:40	04/19/2017-09:40	
Hurley, Sarah Day	March 9, 2017 Status Conf. Roster 9:00 am. Courtroom 8	Action		01/18/2017-09:40	04/19/2017-09:40	
Montgomery, John Michael	March 9, 2017 Status Conf. Roster 9:00 am. Courtroom 8	Action		01/18/2017-09:40	04/19/2017-09:40	
Richburg, Aminah A	Notification to PPS	Filing		01/17/2017-10:40	04/19/2017-10:40	
Richburg, Aminah A	Order/Form 4/Denying Plt's Motion to Reconsider	Order		01/17/2017-10:34	04/19/2017-10:34	
Richburg, Aminah A	Plt/Aminah A Richburg Motion/Compel 1&2 Interrogatories Req	Motion		01/13/2017-13:19	03/20/2017-13:19	
Richburg, Aminah A	Service/Certificate Of Service	Filing		12/20/2016-11:17	04/19/2017-11:17	
Richburg, Aminah A	Request/Hearing	Filing		12/20/2016-11:17	04/19/2017-11:17	
Richburg, Aminah A	Plt's Motion/Reconsider	Motion		12/20/2016-11:16	01/17/2017-11:16	
Richburg, Aminah A	Notice/PPS	Filing		12/08/2016-15:21	04/19/2017-15:21	
Richburg, Aminah A	Order/Protective Order	Order		12/08/2016-13:39	04/19/2017-13:39	
Richburg, Aminah A	Order/Form 4-Plt's Mot Dissolve/Terminate/Cancel PO Denied	Order		12/08/2016-08:56	04/19/2017-08:56	
Williams, E A Rico	Joint Memo in Opposition to Plt's Motion to Compel	Filing		10/31/2016-13:28	04/19/2017-13:28	
South Carolina High School League	Memo in Support of Motion for Protective Order	Filing		10/28/2016-16:24	04/19/2017-16:24	
Richburg, Aminah A	ADR/Alternative Dispute Resolution (Workflow)	Action		10/27/2016-10:23	10/26/2016-10:23	
Montgomery, John Michael	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/25/2016-15:05	04/19/2017-15:05	
Hurley, Sarah Day	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/25/2016-15:05	04/19/2017-15:05	
Laffitte, Rebecca	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/25/2016-15:05	04/19/2017-15:05	
Richburg, Aminah A	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/25/2016-15:05	04/19/2017-15:05	
Richburg, Aminah A	Service/Certificate Of Service	Filing		10/21/2016-11:20	04/19/2017-11:20	
Richburg, Aminah A	Objection to Proposed Deposition Testimony/Deposition	Filing		10/21/2016-08:30	04/19/2017-08:30	
Richburg, Aminah A	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	
Laffitte, Rebecca	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	
Hurley, Sarah Day	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	
Montgomery, John Michael	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	
Montgomery, John Michael	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	
Laffitte, Rebecca	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	
Hurley, Sarah Day	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	

Richburg, Aminah A	10/31/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/14/2016-10:39	04/19/2017-10:39	
Richburg, Aminah A	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Laffitte, Rebecca	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Hurley, Sarah Day	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Montgomery, John Michael	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Montgomery, John Michael	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Hurley, Sarah Day	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Laffitte, Rebecca	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Richburg, Aminah A	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:53	04/19/2017-11:53	
Richburg, Aminah A	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:52	04/19/2017-11:52	
Laffitte, Rebecca	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:52	04/19/2017-11:52	
Hurley, Sarah Day	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:52	04/19/2017-11:52	
Montgomery, John Michael	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-11:52	04/19/2017-11:52	
Hurley, Sarah Day	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Laffitte, Rebecca	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Montgomery, John Michael	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Richburg, Aminah A	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Richburg, Aminah A	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Montgomery, John Michael	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Hurley, Sarah Day	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Laffitte, Rebecca	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Laffitte, Rebecca	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Montgomery, John Michael	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Richburg, Aminah A	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Hurley, Sarah Day	10/24/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		10/12/2016-10:10	04/19/2017-10:10	
Richburg, Aminah A	Plt/Aminah A Richburg Motion/Compel/CoS	Motion		10/11/2016-16:48	11/02/2016-16:48	
Richburg, Aminah A	Motion/Dissolve, Terminate, Cancel Defs Mot for Protect Ord	Motion		09/16/2016-16:55	11/02/2016-16:55	
South Carolina High School League	Memo in Opp to Plt's Mot for Unspecified Relief & Service	Filing		09/16/2016-12:59	04/19/2017-12:59	
South Carolina High School League	Exhibit 1 to Memo in Opposition to Plt's Mot for Unspecified	Filing		09/16/2016-12:59	04/19/2017-12:59	

South Carolina High School League	Exhibit 2 to Memo in Opposition to Plt's Mot for Unspecified	Filing		09/16/2016-12:59	04/19/2017-12:59	
South Carolina High School League	Exhibit 3 to Memo in Opposition to Plt's Mot for Unspecified	Filing		09/16/2016-12:59	04/19/2017-12:59	
Hurley, Sarah Day	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		09/14/2016-11:47	04/19/2017-11:47	
Laffitte, Rebecca	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		09/14/2016-11:47	04/19/2017-11:47	
Richburg, Aminah A	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		09/14/2016-11:47	04/19/2017-11:47	
Montgomery, John Michael	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		09/14/2016-11:47	04/19/2017-11:47	
Montgomery, John Michael	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-16:55	04/19/2017-16:55	
Richburg, Aminah A	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-16:55	04/19/2017-16:55	
Laffitte, Rebecca	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-16:55	04/19/2017-16:55	
Hurley, Sarah Day	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-16:55	04/19/2017-16:55	
Hurley, Sarah Day	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-15:22	04/19/2017-15:22	
Laffitte, Rebecca	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-15:22	04/19/2017-15:22	
Richburg, Aminah A	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-15:22	04/19/2017-15:22	
Montgomery, John Michael	10/17/2016_MOTION_Roster/Notice of Motions Roster Publicatio	Action		09/12/2016-15:22	04/19/2017-15:22	
South Carolina High School League	Exhibit/Filing of Exhibits	Filing		09/09/2016-15:05	04/19/2017-15:05	
South Carolina High School League	Motion/Other	Motion		09/09/2016-15:05	11/02/2016-15:05	
Richburg, Aminah A	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		08/08/2016-09:07	04/19/2017-09:07	
Richburg, Aminah A	MAILED_9/19/2016_MOTION_Notice of Motions Roster Publication	Action		08/08/2016-09:05	04/19/2017-09:05	
Montgomery, John Michael	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		08/08/2016-09:05	04/19/2017-09:05	
Laffitte, Rebecca	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		08/08/2016-09:05	04/19/2017-09:05	
Hurley, Sarah Day	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		08/08/2016-09:05	04/19/2017-09:05	
Hurley, Sarah Day	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		08/03/2016-13:08	04/19/2017-13:08	
Montgomery, John Michael	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		08/03/2016-13:08	04/19/2017-13:08	
Laffitte, Rebecca	9/19/2016_MOTION_Roster/Notice of Motions Roster Publication	Action		08/03/2016-13:08	04/19/2017-13:08	
Richburg, Aminah A	MAILED_9/19/2016_MOTION_Notice of Motions Roster Publication	Action		08/03/2016-13:08	04/19/2017-13:08	
Richburg, Aminah A	Plt/Aminah A Richburg Motion/Request For Hearing/CoS	Motion		08/01/2016-15:50	09/20/2016-15:50	
Richburg, Aminah A	Plaintiff's Response to Interrogatories and Request for Prod	Filing		07/21/2016-16:29	04/19/2017-16:29	

Richburg, Aminah A	Plt Aminah A Richburg First Set Request For Production/Cert	Filing	06/20/2016-14:43	04/19/2017-14:43	
Richburg, Aminah A	Plt First Set Of Continuing Interrogatories To Defendant	Filing	06/20/2016-10:05	04/19/2017-10:05	
Richburg, Aminah A	Ans To South Carolina High School League's Interrogatories	Filing	06/06/2016-12:25	04/19/2017-12:25	
Richburg, Aminah A	Answer/Answer To First Set Of Requests For Production	Filing	06/06/2016-12:18	04/19/2017-12:18	
Richburg, Aminah A	Service/Certificate Of Service By Mail Of Answer	Filing	06/06/2016-10:33	04/19/2017-10:33	
Richburg, Aminah A	Answer/Answer To Answer Of E.A. "Rico" Williams	Filing	06/06/2016-10:27	04/19/2017-10:27	
Richburg, Aminah A	Answer/Answer To Answer Of South Carolina High School League	Filing	06/06/2016-10:08	04/19/2017-10:08	
Williams, E A Rico	Service/Certificate Of Service By Mail	Filing	05/04/2016-14:59	04/19/2017-14:59	
Williams, E A Rico	Answer/Answer and Jury Demand	Filing	05/04/2016-14:59	04/19/2017-14:59	
Williams, E A Rico	Notice/Notice of Appearance	Filing	05/04/2016-14:06	04/19/2017-14:06	
South Carolina High School League	Notice/Notice of Appearance	Filing	05/03/2016-16:36	04/19/2017-16:36	
South Carolina High School League	Answer/Answer	Filing	05/03/2016-16:36	04/19/2017-16:36	
Richburg, Aminah A	Service/Affidavit Of Service S/C on EA Rico Williams	Filing	04/25/2016-10:09	04/19/2017-10:09	
Richburg, Aminah A	Affidavit Of Service S/C/ South Carolina High School League	Filing	04/20/2016-14:49	04/19/2017-14:49	
Richburg, Aminah A	Verification/Verified	Filing	04/01/2016-10:31	04/19/2017-10:31	
Richburg, Aminah A	Summons & Complaint	Filing	03/31/2016-10:22	04/19/2017-10:22	

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Greenville County
13th Judicial Circuit
Public Index



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Switch View

Aminah A Richburg vs. E A Rico Williams , defendant, et al

Case Number:	2016CP2302113	Court Agency:	Greenville County Common Pleas	Filed Date:	03/31/2016
Case Type:	Common Pleas	Case Sub Type:	Slander/Libel 380	File Type:	Jury
Status:	Dismissed	Assigned Judge:			
Disposition:	Dismissed by Court - not Rule 40J	Disposition Date:	04/19/2017	Disposition Judge:	Gravely, Perry H.
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties Judgments Tax Map Information Associated Cases Actions Financials

Summary					
Fine/Costs:	$375.00	Total Paid for fine/costs:	$375.00	Balance Due:	$0.00

Costs				
Description	Cost Code	Amount	Charge Action	Disbursed Amount
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
Civil Filing Fee State 56%	CVFFST	$56.00		$56.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
SCJD Filing Fee Proviso $50 / $25	SCJDPV	$50.00		$50.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
Civil Filing Fee County 44%/100%	CVFFCN	$43.00		$43.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
Greenville County Bar	GCB	$1.00		$1.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00
Motion/Order Filing Fee $25	MOTION	$25.00		$25.00

Payments

Payment Date	Receipt Number	Entered By	Transaction Type Code	Payment Amount
03/06/2017	341357	judys	PY	$25.00
02/28/2017	341026	DAWWILLIAMS	PY	$25.00
02/24/2017	340967	DAWWILLIAMS	PY	$25.00
01/13/2017	338900	perryl	PY	$25.00
12/20/2016	338055	PERRYL	PY	$25.00
10/11/2016	335308	JUDYS	PY	$25.00
09/16/2016	334288	JUDYS	PY	$25.00
09/09/2016	333956	SMANSEL	PY	$25.00
08/01/2016	332349	JUDYS	PY	$25.00
03/31/2016	327162	JUDYS	PY	$150.00

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Appellate Exhibit 38 Emails Earl Richards to Appellate;

Subject: Re: BRIDGE BUILDERS OFFICIALS INC. BULLETIN APRIL 2014

From: aminah richburg (richburga@bellsouth.net)

To: BBOffInc@aol.com;

Date: Tuesday, April 1, 2014 2:00 PM

Mr. Richards, I will be available to officiate in Greenville SC on April 4-6, April 11-13, and April 25-27

Aminah A. Richburg
864-419-6707

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: keese4@msn.com; kelley@knology.net; dominionsportsoutreachministry@yahoo.com; kgeez1@msn.com; kimberlycarroll1@yahoo.com; klex1@att.net; lady12hoopa@yahoo.com; ladyreferee35@gmail.com; john.lesaine@newberry.edu; cylee3@yahoo.com; moses9405@bellsouth.net; bradley.levander@us.af.mil; timlindler@att.net; Zballref@aol.com; jumpball1968@yahoo.com; pmmack@homesc.com; byronmcclure57@yahoo.com; dpwwm@juno.com; raytheref@gmail.com; george.mccoy@pgnmail.com; Varnon.McCrorey@comporium.com; qmcda711@yahoo.com; hmtravel2003@yahoo.com; TMcDavid@greenvillecounty.org; Gqhem@aol.com; mcgannonr@fort-mill.k12.sc.us; Vickie.McKinney@piedmontng.com; sylvester.mcmanus@springs.com; hmmeck@hotmail.com; melvaree.witherspoon.ctr@navy.mil; Dmtenacious7@aol.com; miguel.e.rivera1@navy.mil; mikalafoglewilson@gmail.com; miller100765@yahoo.com; miltgray3@yahoo.com; milton.gray70@yahoo.com; rmims@harsco.com; zoblemorris@msn.com; moss-black@hotmail.com; MSims@charleslea.org; rdnelson83@gmail.com; shannonr_20@yahoo.com; kpelanda79@gmail.com; kpelanda@charter.net; justno@charter.net; pep252003@yahoo.com; tinroad31@yahoo.com; leighann44@hotmail.com; emilepowell@mtc.mailcruiser.com; james_wquick@hotmail.com; jratterree@csbat.com; redman300zx@aol.com; michaelwreese@yahoo.com; mikerice198103@yahoo.com; richburga@bellsouth.net; robertfields.24@hotmail.com; krobinson2294@yahoo.com; Buddah200286@yahoo.com; mrref1967@earthlink.net; heckjess211@msn.com; rlr89@orangeburg5.k12.sc.us; ronald.white@eds.com; sajt38@yahoo.com; jsarratt2@yahoo.com; scotlandj@anderson1.k12.sc.us; bcccs@bellsouth.net; carl.searles@yahoo.com; djohn7@bellsouth.net; seymore4541@roadrunner.com; simsm@glennspringsacademy.org; Tim@breakaway-ministries.com; ejslappy1@yahoo.com; tlsmith_tlsmith@yahoo.com; tlsmith@oagsports.com; jenniebrown52@gmail.com; TSteed@att.net; dedrickstowers@bellsouth.net; taviscowan01@vzw.blackberry.net; darryltodd1@yahoo.com; toryaug@aol.com; jtrice@clemson.edu; silk4run2@yahoo.com; lt2312@yahoo.com; verdint2@mailbox.winthrop.ed; pmw00@bellsouth.net; frmdi92@gmail.com; hwpokey1@hotmail.com; werewolf42@bellsouth.net; SistahRef@comcast.net; gwinters725@gmail.com; Keith.Ritter@sc.usda.gov
Cc: BBOffInc@aol.com
Sent: Tuesday, April 1, 2014 1:52 PM
Subject: BRIDGE BUILDERS OFFICIALS INC. BULLETIN APRIL 2014

BRIDGE BUILDERS OFFICIALS

BULLETIN

TOURNAMENTS

APRIL - 2014

NOTE: ***Bold and Italic are major tournaments***

04-06 ***Battle of the Border Greenville , SC.***

11-13	Spring Hoopfest	Walterboro , SC.
	Carolina Crusaders	Greenville , SC.
25-27	***SC Upper State Qual.***	***Greenville , SC.***
	Columbia Crossover	Columbia , SC.
	Low Country hoops	Walterboro , SC.

Officials we have gotten off to a great start this season, we have two (2) major tournaments this month in Greenville , SC.
Our system of crews is working great, a crew consist of four (4) officials minimum or more and they will be assigned to a gym, with a crew chief. Crew Chiefs reply to this email with your crew's names and cell phone numbers.

If you are not in a crew, please reply to this email with your name and cell phone number and the Officials Coordinator will assign you.

REMEMBER, first come first serve, your email date and time stamp will be the gage.

We thank you for your great work and dedication let's keep having Fun.

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

Subject: Re: 2014 SPRING FLING TOURNAMENT AT DRIBBLE 4 DESTINY GYM - Revised
From: aminah richburg (richburga@bellsouth.net)
To: BBOffInc@aol.com;
Date: Friday, April 11, 2014 11:06 AM

Hi Mr. Richards, I will be leaving the building of my employment and will not have access to my email, so when you send the schedule I will see it later this evening.

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: BBOffInc@aol.com; gwinters725@gmail.com; Nashaunh10@gmail.com; richburga@bellsouth.net; EarlRef@aol.com
Sent: Friday, March 28, 2014 5:22 PM
Subject: Re: 2014 SPRING FLING TOURNAMENT AT DRIBBLE 4 DESTINY GYM - Revised
Officials:

There has been a game moved from this gym to another gym. The 10:15 game on Saturday.

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

In a message dated 3/27/2014 9:27:31 P.M. Eastern Daylight Time, BBOffInc@aol.com writes:

2014 SPRING FLING SCHEDULE

DRIBBLE 4 DESTINY GYM

1800 E. NORHT ST.
Greenville SC. 29607

Officials, please reply receipt of this schedule, we will wear short on Saturday and long pants on Sunday.

PLEASE be on time for your games.

CREW CHIEF: Greg Winters

DAY	TIME	Dribble 4 Destiny		
Saturday	8:00 AM	5b-1	HARRIS N	WINTERS G
3/29/2014	9:00 AM	10g-b1	RICHARDS E	WINTERS G

	10:15 AM	*7b-2*	*RICHARDS E*	*RICHBURG A*
	11:15 AM	11b-2	HARRIS N	WINTERS G
	12:30 PM	9b-b2	RICHARDS E	RICHBURG A
	1:30 PM	10g-b2	HARRIS N	WINTERS G
	2:45 PM	11b-4	HARRIS N	RICHARDS E
	3:45 PM	9b-a6	WINTERS G	RICHBURG A
	5:00 PM	10g-b3	WINTERS G	HARRIS N
	6:00 PM	7b-6	RICHARDS E	RICHBURG A
	7:15 PM	11b-6	WINTERS G	HARRIS N
	8:15 PM	9b-11	RICHARDS E	RICHBURG A
Sunday	8:00 AM	8g-7	HARRIS N	WINTERS G
3/30/2014	9:15 AM	7b-7	RICHARDS E	RICHBURG A
	10:30 AM	11b-8	RICHARDS E	HARRIS N
	11:45 AM	9b-15	WINTERS G	HARRIS N
	1:00 PM	8g-10	HARRIS N	RICHBURG A
	2:15 PM	10g-11	WINTERS G	RICHARDS E
	3:30 PM	5b-11	RICHBURG A	RICHARDS E
	4:45 PM	8g-11	WINTERS G	RICHARDS E

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

Subject: Re: 2014 SPRING FLING TOURNAMENT AT DRIBBLE 4 DESTINY GYM

From: aminah richburg (richburga@bellsouth.net)

To: BBOffInc@aol.com;

Date: Wednesday, April 30, 2014 9:49 PM

Mr. Richards, I will finish my practice at 10 and will be available by 10:30 through the rest of the day.
Aminah Richburg

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: gwinters725@gmail.com; Nashaunh10@gmail.com; richburga@bellsouth.net; EarlRef@aol.com
Cc: BBOffInc@aol.com
Sent: Thursday, March 27, 2014 9:27 PM
Subject: 2014 SPRING FLING TOURNAMENT AT DRIBBLE 4 DESTINY GYM

2014 SPRING FLING SCHEDULE

DRIBBLE 4 DESTINY GYM

1800 E. NORHT ST.
Greenville SC. 29607

Officials, please reply receipt of this schedule, we will wear short on Saturday and long pants on Sunday.

PLEASE be on time for your games.

CREW CHIEF: Greg Winters

DAY	TIME	Dribble 4 Destiny		
Saturday	8:00 AM	5b-1	HARRIS N	WINTERS G
3/29/2014	9:00 AM	10g-b1	RICHARDS E	WINTERS G
	10:15 AM	7b-2	RICHARDS E	RICHBURG A
	11:15 AM	11b-2	HARRIS N	WINTERS G
	12:30 PM	9b-b2	RICHARDS E	RICHBURG A
	1:30 PM	10g-b2	HARRIS N	WINTERS G
	2:45 PM	11b-4	HARRIS N	RICHARDS E
	3:45 PM	9b-a6	WINTERS G	RICHBURG A

	5:00 PM	10g-b3	WINTERS G	HARRIS N
	6:00 PM	7b-6	RICHARDS E	RICHBURG A
	7:15 PM	11b-6	WINTERS G	HARRIS N
	8:15 PM	9b-11	RICHARDS E	RICHBURG A
Sunday	8:00 AM	8g-7	HARRIS N	WINTERS G
3/30/2014	9:15 AM	7b-7	RICHARDS E	RICHBURG A
	10:30 AM	11b-8	RICHARDS E	HARRIS N
	11:45 AM	9b-15	WINTERS G	HARRIS N
	1:00 PM	8g-10	HARRIS N	RICHBURG A
	2:15 PM	10g-11	WINTERS G	RICHARDS E
	3:30 PM	5b-11	RICHBURG A	RICHARDS E
	4:45 PM	8g-11	WINTERS G	RICHARDS E

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

Subject: Re: BRIDGE BUILDERS OFFICIALS INC. BULLETIN MAY 2014

From: aminah richburg (richburga@bellsouth.net)

To: BBOffInc@aol.com;

Date: Wednesday, April 30, 2014 9:13 PM

I would like to officiate.
Aminah Richburg

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: dabills41@yahoo.com; slimfalls@netzero.net; mickey.farmer54@yahoo.com; felicia_cameron@yahoo.com; jammin302003@yahoo.com; robert.fields@hotmail.com; mikalafoglewilson@gmail.com; JGarand@rbcbearings.com; kgeez1@msn.com; thickbro@aol.com; jgeyer@summitupstate.org; redman300zx@aol.com; glasco_1@hotmail.com; d_goodlett@live.com; surge@conninc.com; miltgray3@yahoo.com; milton.gray70@yahoo.com; djgncref@juno.com; djgncref@gmail.com; emergency45@yahoo.com; gregoryseymore@bellsouth.net; talented_1@hotmail.com; coreyhaney@bellsouth.net; corey_haney@bellsouth.net; Bighoopshardy@aol.com; bbjharper@charter.net; jamesjrharris@bellsouth.net; Nashaunh10@gmail.com; lewis_hayes@charter.net; haywoodrf1@msn.com; dahazh@yahoo.com; James.Heffernan@lennar.com; tigerpaws258@yahoo.com; mdjmc@bellsouth.net; ehinton316@yahoo.com; Chubdat@aol.com; holsteadr@msn.com; inmanmartin5@gmail.com; isaacjs53@yahoo.com; lady12hoopa@yahoo.com; jhjackson83@juno.com; jamesquick@knology.net; jayratterree@certusbank.com; klex1@att.net; klex1@sc.rr.com; john.lesaine@newberry.edu; elvisdeb@charter.net; rett2dar@yahoo.com; DougJones@scfbins.com; jsarratt2@yahoo.com; JTRICE@exchange.clemson.edu; keese4@msn.com; kimberlycarroll1@yahoo.com; ladyreferee35@gmail.com; hizvessel@yahoo.com; rlawson@oconee.k12.sc.us; timrlawton@hotmail.com; moses9405@bellsouth.net; luciuslevett1@bellsouth.net; timlindler@att.net; jumpball1968@yahoo.com; bryan.lipscomb.ctr@afcent.af.mil; pmmack@homesc.com; rmagannon@comporium.net; manigault_joe@yahoo.com; jmanigault@georgetowncountysc.org; crystgre9@yahoo.com; primetimechip@yahoo.com; shawnvmattress@yahoo.com; byronmcclure57@yahoo.com; raytheref@gmail.com; george.mccoy@pgnmail.com; david.a.mccrimmon@us.army.mil; hmtravel2003@yahoo.com; TMcDavid@greenvillecounty.org; Gqhem@aol.com; Vickie.McKinney@piedmontng.com; sylvester.mcmanus@springs.com; hmmeck@hotmail.com; JMeekins@greenvillecounty.org; Dmtenacious7@aol.com; miller100765@yahoo.com; zoblemorris@msn.com; moss-black@hotmail.com; MSims@charleslea.org; shannonr_20@yahoo.com; tocean60@bellsouth.net; kpelanda79@gmail.com; kpelanda@charter.net; justno@charter.net; pep252003@yahoo.com; tinroad31@yahoo.com; leighann44@hotmail.com; cb1ed@yahoo.com; dramsey54@sc.rr.com; rashad9@gmail.com; jratterree@charter.net; richburga@bellsouth.net; Rich1berger@aol.com; uokiok2@yahoo.com; Ruokiok2@aol.com; Keith.Ritter@sc.usda.gov; Srevirj@aol.com; David.Rockholt@comporium.com; Buddah200286@yahoo.com; russelltroy@yahoo.com; sajt38@yahoo.com; thagamej@yahoo.com
Cc: BBOffInc@aol.com
Sent: Monday, April 28, 2014 8:52 PM
Subject: BRIDGE BUILDERS OFFICIALS INC. BULLETIN MAY 2014

BRIDGE BUILDERS OFFICIALS

BULLETIN

TOURNAMENTS

MAY – 2014

We have completed another successful month of basketball tournaments. We are revving up for the up coming month of May; with several major tournaments coming up, also several of the WBCBL semi-pro teams are requesting us to assign officials to their games. If you would like to participate in those games you will have to register at www.wbcbl.com. You must purchase their officiating shirt, you may get it from www.oagofficials.com

Your registration for this summer tournaments season is **$20.00**, please make sure to contact the officials coordinator about your registration.

Our system of crews is working great, a crew consist of four (4) officials minimum or more and they will be assigned to a gym, with a crew chief. Crew Chiefs reply to this email with your crew's names and cell phone numbers.
If you are not part of a crew, please reply to this email with your name and cell phone number and the

Officials Coordinator will assign you individually or to a crew.

NOTE: ***Major tournaments are in bold and italics***

02-04 Foothills Shootout Spartanburg , SC.
Boys & Girls Lower State Charleston

09-10 Palmetto State Classic Greenville , SC.

16-18 SC Boys -Girls 2nd Qual. Greenville, SC

23-25 Great Smokies Shootout Hickory , NC

30-01 SC Boys-Girls State Championships Greenville , SC

REMEMBER, first come first serve, your email date and time stamp will be the gage.

We thank you for your great work and dedication let's keep having Fun.

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.

Subject: Re: 2014 FOOTHILL CLASSIC TOURNAMENT GYM SITES ADDRESS AND NOTES

From: aminah richburg (richburga@bellsouth.net)

To: BBOffInc@aol.com;

Date: Thursday, May 8, 2014 11:35 PM

Mr. Richards, Let me know if you will assign me to call games this weekend.
Aminah Richburg

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: haywoodrf1@msn.com; richburga@bellsouth.net; miltgray3@yahoo.com; milton.gray70@yahoo.com; jsmith@nortonaudits.com; jefsmi1042@sc.rr.com; elvisdeb@charter.net; Michael.davidson0626@yahoo.com; Bighoopshardy@aol.com; dabills41@yahoo.com; inmanmartin5@gmail.com; primetimechip@yahoo.com; gwinters725@gmail.com
Cc: BBOffInc@aol.com
Sent: Thursday, May 1, 2014 12:04 PM
Subject: 2014 FOOTHILL CLASSIC TOURNAMENT GYM SITES ADDRESS AND NOTES

Officials,

These are the only instructions we have been provided for the gym sites, please review and keep with you, Bridge Builders Officials Inc., has no information on how the gyms are numbered so please be early so we can get the games started on time, thank you for your cooperation.

Foothills Classic Gym Sites

University of South Carolina Upstate USC UPSTATE
800 University Way
Spartanburg, South Carolina 29303

There are 3 gyms at this site. One main gym and there are two located on the back side of the campus across from the softball fields

Converse College
580 East Main Street
Spartanburg, South Carolina 29302
There are 2 gyms located at this site. One located on the main campus and one located across the street at the athletic complex.

Landrum High School
18818 Asheville Highway
Campobello, SC 29322

There are two gyms located within the same facility. The gym is located on the back side of the school closest to the football field.

Whitlock Flexible Learning Center
364 Succesful Way
Spartanburg, South Carolina 29303
There is one gym at this location

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

Gmail Aminah Richburg <aminaha.robinson@gmail.com>

Re: 2014 SPRING FLING TOURNAMENT AT DRIBBLE 4 DESTINY GYM - Revised

3 messages

aminah richburg <richburga@bellsouth.net> Tue, Apr 1, 2014 at 12:27 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "BBOffInc@aol.com" <BBOffInc@aol.com>

Mr. Richards, I thank you for granting me the opportunity to officiate basketball games under your leadership this past weekend. I have been reflecting upon your assessment of my performance and I appreciate your candor and your honesty, and I must do the same. I have a tendency to refuse to acknowledge my weaknesses and did not acknowledge my fatigue when you put me on blast for walking. I hope you are having a good week. If you don't mind I need a little more time on my reflections, the process requires deliberate thought and it is one that I cannot rush right now. I have been operating in the present / now/ day to day, etc and your request has charged me to really slow down and reflect on my future period, thank you Earl!!!
Aminah

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: BBOffInc@aol.com; gwinters725@gmail.com; Nashaunh10@gmail.com; richburga@bellsouth.net; EarlRef@aol.com
Sent: Friday, March 28, 2014 5:22 PM
Subject: Re: 2014 SPRING FLING TOURNAMENT AT DRIBBLE 4 DESTINY GYM - Revised
Officials:

There has been a game moved from this gym to another gym. The 10:15 game on Saturday.

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

In a message dated 3/27/2014 9:27:31 P.M. Eastern Daylight Time, BBOffInc@aol.com writes:

> **2014 SPRING FLING SCHEDULE**
>
> **DRIBBLE 4 DESTINY GYM**
>
> **1800 E. NORHT ST.**
> **Greenville SC. 29607**
>
> **Officials, please reply receipt of this schedule, we will wear short on Saturday and long pants on Sunday.**
>
> **PLEASE be on time for your games.**
>
> **CREW CHIEF: Greg Winters**

DAY	TIME	Dribble 4 Destiny		
Saturday	8:00 AM	5b-1	HARRIS N	WINTERS G
3/29/2014	9:00 AM	10g-b1	RICHARDS E	WINTERS G
	10:15 AM	*7b-2*	*RICHARDS E*	*RICHBURG A*
	11:15 AM	11b-2	HARRIS N	WINTERS G
	12:30 PM	9b-b2	RICHARDS E	RICHBURG A
	1:30 PM	10g-b2	HARRIS N	WINTERS G
	2:45 PM	11b-4	HARRIS N	RICHARDS E
	3:45 PM	9b-a6	WINTERS G	RICHBURG A
	5:00 PM	10g-b3	WINTERS G	HARRIS N
	6:00 PM	7b-6	RICHARDS E	RICHBURG A
	7:15 PM	11b-6	WINTERS G	HARRIS N
	8:15 PM	9b-11	RICHARDS E	RICHBURG A
Sunday	8:00 AM	8g-7	HARRIS N	WINTERS G
3/30/2014	9:15 AM	7b-7	RICHARDS E	RICHBURG A
	10:30 AM	11b-8	RICHARDS E	HARRIS N
	11:45 AM	9b-15	WINTERS G	HARRIS N
	1:00 PM	8g-10	HARRIS N	RICHBURG A
	2:15 PM	10g-11	WINTERS G	RICHARDS E
	3:30 PM	5b-11	RICHBURG A	RICHARDS E
	4:45 PM	8g-11	WINTERS G	RICHARDS E

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "BBOffInc@aol.com" <BBOffInc@aol.com>

Tue, Apr 1, 2014 at 3:02 PM

I appreciate your compliment, and I believe your intervention would assist me with reflecting . I had some awsome experiences and observations this past weekend that will shape my execution when I officiate,

looking forward to future discussions.
Aminah

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: richburga@bellsouth.net
Sent: Tuesday, April 1, 2014 2:10 PM
Subject: Re: 2014 SPRING FLING TOURNAMENT AT DRIBBLE 4 DESTINY GYM - Revised

Aminah,

Lady you are special, I know you have all the potential to be succesfull at this avocation, maybe you just need to sit down with me and we can talk of ways to help you do just that.

Love in Christ.

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

[Quoted text hidden]

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aminah richburg <richburga@bellsouth.net> Fri, Apr 11, 2014 at 11:06 AM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "BBOffInc@aol.com" <BBOffInc@aol.com>

Hi Mr. Richards, I will be leaving the building of my employment and will not have access to my email, so when you send the schedule I will see it later this evening.

[Quoted text hidden]

Gmail Aminah Richburg <aminaha.robinson@gmail.com>

Re: 2014 SC STATE CHAMPIOONSHIP AVAILABILITY 30 MAY - 01 JUNE

3 messages

aminah richburg <richburga@bellsouth.net>
To: BBOffInc@aol.com

Tue, May 27, 2014 at 9:32 AM

On Mon, 5/26/14, BBOffInc@aol.com <BBOffInc@aol.com> wrote:

Subject: 2014 SC STATE CHAMPIOONSHIP AVAILABILITY 30 MAY - 01 JUNE
To: ralphpatin72@gmail.com, kpelanda79@gmail.com, kpelanda@charter.net, justno@charter.net, pep252003@yahoo.com, tinroad31@yahoo.com, leighann44@hotmail.com, cpowell91@bellsouth.net, james_wquick@hotmail.com, rashad9@gmail.com, jratterree@charter.net, redman300zx@aol.com, michaelwreese@yahoo.com, rhone22@att.net, Ruokiok2@aol.com, uokiok2@yahoo.com, Rich1berger@aol.com, richburga@bellsouth.net, Srevirj@aol.com, sajt38@yahoo.com, jsarratt2@yahoo.com, thagamej@yahoo.com, georgescottbball@bellsouth.net, lascott07@yahoo.com, bcccs@bellsouth.net, carl.searles@yahoo.com, simsm@glennspringsacademy.org, ejslappy1@yahoo.com, jefsmi1042@sc.rr.com, tsteed@att.net, dedrickstowers@bellsouth.net, dedstowers@gmail.com, pya32@aol.com, darryltodd1@yahoo.com, jtrice@clemson.edu, trbritt2@yahoo.com, verdint2@mailbox.winthrop.edu, lt2312@yahoo.com, frmdi92@gmail.com, hwpokey1@hotmail.com, tccw8@hotmail.com, ericowms@charter.net, williams.jacky@yahoo.com, SistahRef@comcast.net, gwinters725@gmail.com
Cc: BBOffInc@aol.com
Date: Monday, May 26, 2014, 7:51 PM

I will be available to officiate May 30 - June 1.
Aminah Richburg

2014
SC STATE
CHAMPIONSHIPS

MAY 30
THRU JUN
01

Officials,

The SC
Boys
& Girls Championship will be held in
Greenville ,
SC.

Please submit your availability for
this tournament, by
replying to this email with your name and cell phone
number.

Crew Chiefs please list the names of
the officials in
your crew with their cell phone
number.

PLEASE REPLY BY WEDNESDAY 28 MAY
2014 AT 6:00
PM

Earl
F. Richards
Bridge Builders Officials Inc.
2037 Picadilly
Dr.
Cayce, SC. 29033
803-605-7793

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aminah richburg <richburga@bellsouth.net> Tue, May 27, 2014 at 9:33 AM
To: BBOffInc@aol.com

On Mon, 5/26/14, BBOffInc@aol.com <BBOffInc@aol.com> wrote:

Subject: 2014 SC STATE CHAMPIOONSHIP AVAILABILITY 30 MAY - 01 JUNE
To: ralphpatin72@gmail.com, kpelanda79@gmail.com, kpelanda@charter.net, justno@charter.net, pep252003@yahoo.com, tinroad31@yahoo.com, leighann44@hotmail.com, cpowell91@bellsouth.net, james_wquick@hotmail.com, rashad9@gmail.com, jratterree@charter.net, redman300zx@aol.com, michaelwreese@yahoo.com, rhone22@att.net, Ruokiok2@aol.com, uokiok2@yahoo.com, Rich1berger@aol.com, richburga@bellsouth.net, Srevirj@aol.com, sajt38@yahoo.com, jsarratt2@yahoo.com, thagamej@yahoo.com, georgescottbball@bellsouth.net, lascott07@yahoo.com, bcccs@bellsouth.net, carl.searles@yahoo.com, simsm@glennspringsacademy.org, ejslappy1@yahoo.com, jefsmi1042@sc.rr.com, tsteed@att.net, dedrickstowers@bellsouth.net, dedstowers@gmail.com, pya32@aol.com, darryltodd1@yahoo.com, jtrice@clemson.edu, trbritt2@yahoo.com, verdint2@mailbox.winthrop.edu, lt2312@yahoo.com, frmdi92@gmail.com, hwpokey1@hotmail.com, tccw8@hotmail.com, ericowms@charter.net, williams.jacky@yahoo.com, SistahRef@comcast.net, gwinters725@gmail.com
Cc: BBOffInc@aol.com
Date: Monday, May 26, 2014, 7:51 PM

Aminah Richburg, availability confirmed -864-419-6707
[Quoted text hidden]

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aminah richburg <richburga@bellsouth.net> Tue, May 27, 2014 at 8:54 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "BBOffInc@aol.com" <BBOffInc@aol.com>

Mr. Richards I am available for the entire weekend but I will need a break from 11:00 am to 12:30 on Saturday. If I could start with early games in the morning with the break I will have no other conflicts for the rest of the weekend.
Thank You
Aminah Richburg

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: ralphpatin72@gmail.com; kpelanda79@gmail.com; kpelanda@charter.net; justno@charter.net; pep252003@yahoo.com; tinroad31@yahoo.com; leighann44@hotmail.com; cpowell91@bellsouth.net; james_wquick@hotmail.com; rashad9@gmail.com; jratterree@charter.net; redman300zx@aol.com; michaelwreese@yahoo.com; rhone22@att.net; Ruokiok2@aol.com; uokiok2@yahoo.com; Rich1berger@aol.com; richburga@bellsouth.net; Srevirj@aol.com; sajt38@yahoo.com; jsarratt2@yahoo.com; thagamej@yahoo.com; georgescottbball@bellsouth.net; lascott07@yahoo.com; bcccs@bellsouth.net; carl.searles@yahoo.com; simsm@glennspringsacademy.org; ejslappy1@yahoo.com; jefsmi1042@sc.rr.com; tsteed@att.net; dedrickstowers@bellsouth.net; dedstowers@gmail.com; pya32@aol.com; darryltodd1@yahoo.com; jtrice@clemson.edu; trbritt2@yahoo.com; verdint2@mailbox.winthrop.edu; lt2312@yahoo.com; frmdi92@gmail.com; hwpokey1@hotmail.com; tccw8@hotmail.com; ericowms@charter.net; williams.jacky@yahoo.com;

SistahRef@comcast.net; gwinters725@gmail.com
Cc: BBOffInc@aol.com
Sent: Monday, May 26, 2014 3:51 PM
Subject: 2014 SC STATE CHAMPIOONSHIP AVAILABILITY 30 MAY - 01 JUNE

2014 SC STATE CHAMPIONSHIPS

MAY 30 THRU JUN 01

Officials,

The SC Boys & Girls Championship will be held in Greenville , SC.

Please submit your availability for this tournament, by replying to this email with your name and cell phone number.

Crew Chiefs please list the names of the officials in your crew with their cell phone number.

PLEASE REPLY BY WEDNESDAY 28 MAY 2014 AT 6:00 PM

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

Gmail Aminah Richburg <aminaha.robinson@gmail.com>

Re: 2014 SC STATE CHAMPIONSHIPS AT POTENTIAL SPORTS ACADEMY GYM # 3

2 messages

aminah richburg <richburga@bellsouth.net> Thu, May 29, 2014 at 1:11 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "BBOffInc@aol.com" <BBOffInc@aol.com>, "JBooker@greenvillecounty.org" <JBooker@greenvillecounty.org>, "mickey.farmer54@yahoo.com" <mickey.farmer54@yahoo.com>, "chadhendrickks@gmail.com" <chadhendrickks@gmail.com>, "ralphpatin72@gmail.com" <ralphpatin72@gmail.com>, "bbjharper@charter.net" <bbjharper@charter.net>

I will be there thank you.
Aminah Richburg

On Thursday, May 29, 2014 1:00 PM, "BBOffInc@aol.com" <BBOffInc@aol.com> wrote:

2014 SC BOYS-GIRLS STATE CHAMPIONSHIPS

POTENTIAL SPORTS ACADEMY GYM # 3

49 Osage Dr.
Greenville, SC. 29605

Officials, please reply receipt of this schedule, we will wear shorts on Saturday and long pants on Sunday

Mr. Earl Richards is tournament coordinator for this tournament, his contact number is 803-605-7793.

Your registration fee for this year is $20.00; speak to your tournament coordinator.

PLEASE GET TO SITES EARLY

CREW CHIEF: J C Booker

DAY	TIME	Potential 3		
Saturday	9:00 AM	5b-1	HENDERSON L	BOOKER J
5/31/2014	10:15 AM	8b-1	FARMER M	BOOKER J
	11:30 AM	5b-2	FARMER M	HENDERSON L
	12:45 PM	5b-5	BOOKER J	HENDERSON L
	2:00 PM	8g-4	BOOKER J	FARMER M
	3:15 PM	5b-6	HENDERSON L	FARMER M
	4:30 PM	5b-7	HENDERSON L	HENDRICKS C
	5:45 PM	7g-a3	BOOKER J	FARMER M
	7:00 PM	8g-6	HENDERSON L	HENDRICKS C
	8:15 PM			
Sunday	8:00 AM	5b-9	RICHBURG A	PATIN R
6/1/2014	9:15 AM	6b-8	HENDERSON L	HARPER B
	10:30 AM	7g-12	BOOKER J	FARMER M
	11:45 AM	5b-11	PATIN R	RICHBURG A
	1:00 PM	5b-17	HENDERSON L	HARPER B
	2:15 PM	8b-20	BOOKER J	FARMER M
	3:30 PM	5b-15	HENDERSON L	HARPER B
	4:45 PM	5b-14	BOOKER J	FARMER M

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

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aminah richburg <richburga@bellsouth.net> Thu, May 29, 2014 at 1:31 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "BBOffInc@aol.com" <BBOffInc@aol.com>

Did not see Saturday, just Sunday.
Aminah Richburg

On Thursday, May 29, 2014 1:13 PM, "BBOffInc@aol.com" <BBOffInc@aol.com> wrote:

did you received Saturday's schedule at Velocity gym

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

[Quoted text hidden]

Gmail Aminah Richburg <aminaha.robinson@gmail.com>

Re: BRIDGE BUILDERS OFFICIALS INC. BULLETIN JUNE 2014

2 messages

aminah richburg <richburga@bellsouth.net> Mon, Jun 16, 2014 at 10:24 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: "BBOffInc@aol.com" <BBOffInc@aol.com>

I am available this weekend.
Aminah

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: sajt38@yahoo.com; thagamej@yahoo.com; jsarratt2@yahoo.com; scotlandj@anderson1.k12.sc.us; lascott07@yahoo.com; bcccs@bellsouth.net; carl.searles@yahoo.com; djohn7@bellsouth.net; tonysimmons1982@yahoo.com; tsimmonstennis2014@gmail.com; simsm@glennspringsacademy.org; gsmithie@yahoo.com; tlsmith_tlsmith@yahoo.com; jenniebrown52@gmail.com; dedrickstowers@bellsouth.net; dedstowers@gmail.com; pya32@aol.com; tndbritt2010@yahoo.com; darryltodd1@yahoo.com; sccatfan@yahoo.com; tory_vinson@yahoo.com; jtrice@clemson.edu; silk4run2@yahoo.com; lt2312@yahoo.com; steve.waddell@millken.com; hwpokey1@hotmail.com; darryl.weeks@comcast.net; tccw8@hotmail.com; jecup@live.com; JWilliams@CityOfEasley.com; ericowms@charter.net; Ericowms@charter.net; Van.Williams@bmwmc.com; certheaddoc@yahoo.com; gwinters725@gmail.com; SistahRef@comcast.net; richburga@bellsouth.net
Cc: BBOffInc@aol.com
Sent: Monday, June 16, 2014 8:44 PM
Subject: BRIDGE BUILDERS OFFICIALS INC. BULLETIN JUNE 2014

BRIDGE BUILDERS OFFICIALS

BULLETIN

TOURNAMENTS

JUNE – 2014

Our system of crews is working great, a crew consist of four (4) officials minimum or more and they will be assigned to a gym, with a crew chief. Crew Chiefs reply to this email with your crew's names and cell phone numbers.

If you are not part of a crew, please reply to this email with your name and cell phone number and the Officials Coordinator will assign you individually or to a crew.

NOTE: ***Major tournaments are in bold and italics***

20-22 Furman Team Camp Greenville , SC.

Need eight (8) to nine (9) officials games start at 2:00 PM on Friday

21-22 Last Shot Greenville , SC.

27-29 Greenville –Vegas showdown Greenville , SC.

REMEMBER, first come first serve, your email date and time stamp will be the gage.

We thank you for your great work and dedication let's keep having Fun.

Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

---

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
Mon, Jun 16, 2014 at 10:29 PM

To: "BBOffInc@aol.com" <BBOffInc@aol.com>

Aminah Richburg -864-419-6707 - Available - June 20 - 22, June 27-29

From: "BBOffInc@aol.com" <BBOffInc@aol.com>
To: sajt38@yahoo.com; thagamej@yahoo.com; jsarratt2@yahoo.com; scotlandj@anderson1.k12.sc.us; lascott07@yahoo.com; bcccs@bellsouth.net; carl.searles@yahoo.com; djohn7@bellsouth.net; tonysimmons1982@yahoo.com; tsimmonstennis2014@gmail.com; simsm@glennspringsacademy.org; gsmithie@yahoo.com; tlsmith_tlsmith@yahoo.com; jenniebrown52@gmail.com; dedrickstowers@bellsouth.net; dedstowers@gmail.com; pya32@aol.com; tndbritt2010@yahoo.com; darryltodd1@yahoo.com; sccatfan@yahoo.com; tory_vinson@yahoo.com; jtrice@clemson.edu; silk4run2@yahoo.com; tl2312@yahoo.com; steve.waddell@milliken.com; hwpokey1@hotmail.com; darryl.weeks@comcast.net; tccw8@hotmail.com; jecup@live.com; JWilliams@CityOfEasley.com; ericowms@charter.net; Ericowms@charter.net; Van.Williams@bmwmc.com; certheaddoc@yahoo.com; gwinters725@gmail.com; SistahRef@comcast.net; richburga@bellsouth.net
Cc: BBOffInc@aol.com
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BULLETIN

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Earl F. Richards
Bridge Builders Officials Inc.
2037 Picadilly Dr.
Cayce, SC. 29033
803-605-7793

Appellate Exhibit 39 Emails Appellate Non-SCHSL Games Assigned by Respondent Rico Williams through email communication with his business beginning November 22, 2013 – April 27, 2015

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Saturday games
2 messages

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Fri, Nov 22, 2013 at 8:16 AM

I am available to officiate.
Aminah Richburg

From: Rico <ericowms@charter.net>
To:
Sent: Thursday, November 21, 2013 10:49 AM
Subject: Saturday games

If you would like to officiate some youth league games on Saturday afternoons let me know via email.....

Rico

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Fri, Nov 22, 2013 at 2:24 PM

I WILL BE THERE.

From: Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Sent: Friday, November 22, 2013 11:34 AM
Subject: Re: Saturday games

Aminah if you will go to Adams Mill YMCA on Hwy 14 in Simpsonville Saturday at 1, 2 & 3 pm for three games. Take 385 South >> then exit 31 >> then left at the light to Simpsonville (414) >> then left at next light by Hardees (hwy14).

Black shorts are acceptable with rest of uniform, it will be 2 person crew with the particular rules for specific age groups at the table. Also fill out a bank direct deposit form at the table in order to be paid.

Please confirm,

Rico

On Fri, Nov 22, 2013 at 8:16 AM, aminah richburg wrote:

> I am available to officiate.

Aminah Richburg

From: Rico <ericowms@charter.net >
To:
Sent: Thursday, November 21, 2013 10:49 AM
Subject: Saturday games

If you would like to officiate some youth league games on Saturday afternoons let me know via email.....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Saturday Youth Games

2 messages

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Wed, Dec 4, 2013 at 3:22 PM

I can work on the 7th, 14th and the 21st at 12 or 1 just choose out of dates selected when I can work
Aminah

From: Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Sent: Wednesday, December 4, 2013 2:17 PM
Subject: Saturday Youth Games

If you are available to work youth games on Dec. 7th, 14th & 21st beginning at 12 or 1 pm let me know, and be specific if you can work one or two dates but not all.

Rico

---

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Fri, Dec 6, 2013 at 4:05 PM

Games confirmed Dec. 7,14 &21

From: Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Sent: Thursday, December 5, 2013 12:46 PM
Subject: Re: Saturday Youth Games

Please confirm Dec. 7, 14 & 21 at Adams Mill YMCA on Hwy 14 in Simpsonville. Dec. 7 on court 1; Dec. 14 and 21 on court 2. All games at 1 pm (3 games). Mark these dates and times off in Arbiter.....

Rico

[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Holiday games

1 message

aminah richburg <richburga@bellsouth.net> Sun, Dec 15, 2013 at 1:01 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Im interested . Rico
Aminah

From: Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Sent: Thursday, December 12, 2013 10:25 PM
Subject: Holiday games

Let me know if you're interested in working games (teenage - adults) beginning next weekend through the weeks and weekends of January. There will opportunitles virtually every day of the week/weekend and slots will be filled as soon as possible.

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Saturday Games

1 message

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Wed, Dec 18, 2013 at 5:04 PM

Confirmed
Aminah

From: Rico <ericowms@charter.net>
To: Aminah A. Richburg <richburga@bellsouth.net>
Sent: Tuesday, December 17, 2013 6:33 PM
Subject: Saturday Games

Aminah, confirm the following:

Saturday, Dec. 21 >>> Easley Rec Center (JB Owens Complex) >> 10 am >> 4 games COURT C which is the third court to the right when you walk in.

These will be short youth games with 1 ref. Game rules will be at the table. $22/game and you will need to fill out a W-9 form at the front desk -- they pay each week. Shorts are fine....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Game Opportunities

1 message

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Tue, Dec 31, 2013 at 6:57 PM

I am interested however I accepted games in arbiter on 1/6, 1/7, 1/9, 1/10, I am willing to do a game on 1/8 if one is available, I will need your help in doing other games and arbiter in the future

From: Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Sent: Monday, December 30, 2013 10:44 AM
Subject: Game Opportunities

I have several opportunities to officiate in different leagues beginning Monday, Jan. 6. If you would like to work let me know.....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Furman Intramurals

2 messages

aminah richburg <richburga@bellsouth.net> Sun, Jan 5, 2014 at 3:40 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

I can work just need to know dates and times, based on what I receive from Arbiter.
Aminah

From: Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Sent: Sunday, January 5, 2014 11:51 AM
Subject: Furman Intramurals

If you are interested in working Furman's Intramurals beginning next week (Jan. 13) let me know of your availabilities....

Rico

aminah richburg <richburga@bellsouth.net> Sun, Jan 5, 2014 at 11:49 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Available Dates for Aminah Richburg
1/8, 1/11, 1/12, 1/15, 1/16, 1/17, 1/18, 1/19, 1/20, 1/22, 1/24, 1/25, 1/26, 1/29, 1/31
Based on Arbiter
If I could get a full listing of scheduled games according to the available dates submitted for January for the proposed Furman Games or games with other organizations, it would allow me to plan accordingly for the month of January, I have not received games for February.

From: Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Sent: Sunday, January 5, 2014 11:51 AM
Subject: Furman Intramurals

If you are interested in working Furman's Intramurals beginning next week (Jan. 13) let me know of your availabilities....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Furman Intramurals

4 messages

aminah richburg <richburga@bellsouth.net> Mon, Jan 20, 2014 at 1:51 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico, I have the following dates available in January, 1/22,1/24,1/25,1/29,1/30. Bob has not sent any games for February. Let me know if you have any games available.
Aminah

From: Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Sent: Monday, January 6, 2014 10:00 PM
Subject: Re: Furman Intramurals

Aminah will you help me on Thursday Jan. 16? There are three games at the Easley Rec Center ---Ct 2 -- at 6 pm. If you accept these you must block this date off in Arbiteras SOON as possible.

Rico

Mondays - Thursdays. If there are dates you want to work let me know and if I confirm you then mark those dates off in Arbiter.....Rico

On Sun, Jan 5, 2014 at 3:40 PM, aminah richburg wrote:

> I can work just need to know dates and times, based on what I receive from Arbiter.
Aminah

From: Rico <ericowms@charter.net <javascript:parent.wgMail.openComposeWindow('ericowms@charter.net') > <javascript:parent.wgMail.openComposeWindow('ericowms@charter.net') > >
To: Rico Williams <Ericowms@charter.net <javascript:parent.wgMail.openComposeWindow('Ericowms@charter.net') > <javascript:parent.wgMail.openComposeWindow('Ericowms@charter.net') > >
Sent: Sunday, January 5, 2014 11:51 AM
Subject: Furman Intramurals

If you are interested in working Furman's Intramurals beginning next week (Jan. 13) let me know of your availabilities....

Rico

aminah richburg <richburga@bellsouth.net> Mon, Jan 20, 2014 at 9:39 PM

Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico, I just found out that I cannot be available this Saturday, the other dates are ok.
Sorry

From: Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Sent: Monday, January 20, 2014 5:14 PM
Subject: Re: Furman Intramurals

Aminah, please confirm the following dates:

Saturday Jan 25 > GS Adams Mill YMCA > Ct 1 > 1,2,3 pm

Wednesday Jan. 29 > Furman Univ. > 6 & 7 pm (Games are at Herman Lay PAC Center; come in door to the left once entereing the gym; shorts are fine; fill out tax form [I'll be there]).

Thursday Jan. 30 > West Greenville Comm Center > 6 & 7 pm (8 Rochester St. (Pendleton, right on N. Textile, Queen, Center on the right.)

Rico

On Mon, Jan 20, 2014 at 1:51 PM, aminah richburg wrote:

> Rico, I have the following dates available in January, 1/22,1/24,1/25,1/29,1/30. Bob has not sent any games for February. Let me know if you have any games available.
Aminah

From: Rico <ericowms@charter.net >
To: aminah richburg <richburga@bellsouth.net >
Sent: Monday, January 6, 2014 10:00 PM
Subject: Re: Furman Intramurals

Aminah will you help me on Thursday Jan. 16? There are three games at the Easley Rec Center ---Ct 2 -- at 6 pm. If you accept these you must block this date off in Arbiteras SOON as possible.

Rico

Mondays - Thursdays. If there are dates you want to work let me know and if I confirm you then mark those dates off in Arbiter.....Rico

On Sun, Jan 5, 2014 at 3:40 PM, aminah richburg wrote:

> I can work just need to know dates and times, based on what I receive from Arbiter.

Aminah

From: Rico <

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Mon, Jan 20, 2014 at 9:50 PM

Rico, I have a game in Arbiter for 1/30, available on 1/31, not available on 1/25, The only game I can work is at Furman 1/29. Dates available, 1/22,1/24,1/31

Sorry for the changes in my schedule
Aminah
[Quoted text hidden]

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Mon, Jan 27, 2014 at 9:41 AM

Rico, I have not received any basketball games in arbiter for the month of February, if you have some dates available, let me know.
Aminah

From: Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Sent: Monday, January 6, 2014 10:00 PM
Subject: Re: Furman Intramurals

Aminah will you help me on Thursday Jan. 16? There are three games at the Easley Rec Center ---Ct 2 -- at 6 pm. If you accept these you must block this date off in Arbiteras SOON as possible.

Rico

Mondays - Thursdays. If there are dates you want to work let me know and if I confirm you then mark those dates off in Arbiter.....Rico

On Sun, Jan 5, 2014 at 3:40 PM, aminah richburg wrote:

> I can work just need to know dates and times, based on what I receive from Arbiter.
Aminah

From: Rico <ericowms@charter.net <javascript:parent.wgMail.openComposeWindow('ericowms@charter.net') > <javascript:parent.wgMail.openComposeWindow('ericowms@charter.net') > >
To: Rico Williams <Ericowms@charter.net <javascript:parent.wgMail.openComposeWindow('Ericowms@charter.net') > <javascript:parent.wgMail.openComposeWindow('Ericowms@charter.net') > >
Sent: Sunday, January 5, 2014 11:51 AM

Subject: Furman Intramurals

If you are interested in working Furman's Intramurals beginning next week (Jan. 13) let me know of your availabilities....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Next Week

2 messages

aminah richburg <richburga@bellsouth.net> Tue, Jan 28, 2014 at 9:39 AM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

I am available on all the days listed.
Aminah

From: Rico <ericowms@charter.net>
To:
Sent: Monday, January 27, 2014 4:48 PM
Subject: Next Week

If you are available Feb. 2 - Feb. 7 and Feb. - Feb. 14 for games let me know as soon as possible.

Rico

aminah richburg <richburga@bellsouth.net> Wed, Jan 29, 2014 at 12:29 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico I am confirming Monday Feb. 3 - Park Av. 6,7,8 - Tuesday Feb. 4. - Easley Court 2 - 6,7 and Thursday Feb. 6. West Greenville 6,7

From: Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Sent: Wednesday, January 29, 2014 11:42 AM
Subject: Re: Next Week

Aminah, make this adjustment please: Confirm and mark off dates....Rico

*** Monday Feb. 3 >> Park Ave. St gym >> 6, 7, 8 pm
Tuesday Feb. 4 >> Easley Rec court 2 >> 6,7 pm
Thursday Feb. 6 >> West Greenville Comm Center >> 6,7 pm

Once you confirm I'll send more info.....Rico

I sent you a schedule. Confirm and mark off dates in Arbiter....

On Tue, Jan 28, 2014 at 9:39 AM, aminah richburg wrote:

> I am available on all the days listed.
Aminah

From: Rico <ericowms@charter.net <javascript:parent.wgMail.openComposeWindow('ericowms@charter.net') > <javascript:parent.wgMail.openComposeWindow('ericowms@charter.net') > >
To:
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Subject: Next Week

If you are available Feb. 2 - Feb. 7 and Feb. - Feb. 14 for games let me know as soon as possible.

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Week of Feb.10-14 and Feb.17-21

2 messages

aminah richburg <richburga@bellsouth.net> Wed, Feb 5, 2014 at 11:55 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

I am available for games for Feb. 10-14 and Feb. 17-21.
Aminah

From: Rico <ericowms@charter.net>
To:
Sent: Wednesday, February 5, 2014 3:09 PM
Subject: Week of Feb.10-14 and Feb.17-21

If you are available for the time period of Feb.10 -14 and Feb. 17-21 let me know.....

Rico

aminah richburg <richburga@bellsouth.net> Fri, Feb 7, 2014 at 1:23 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico, don't forget to send dates so I may make arrangements for my children.

From: Rico <ericowms@charter.net>
To:
Sent: Wednesday, February 5, 2014 3:09 PM
Subject: Week of Feb.10-14 and Feb.17-21

If you are available for the time period of Feb.10 -14 and Feb. 17-21 let me know.....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Furman Intramurals

1 message

aminah richburg <richburga@bellsouth.net> Tue, Feb 18, 2014 at 2:46 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico, don't forget about me if there are any officiating opportunities.
Aminah

From: Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Sent: Tuesday, January 21, 2014 6:26 AM
Subject: Re: Furman Intramurals

Aminah I have your changes and will remove you from the games I had you scheduled for.....Rico

On Mon, Jan 20, 2014 at 9:50 PM, aminah richburg wrote:

> Rico, I have a game in Arbiter for 1/30, available on 1/31, not available on 1/25, The only game I can work is at Furman 1/29. Dates available, 1/22,1/24,1/31

Sorry for the changes in my schedule
Aminah

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To: aminah richburg <richburga@bellsouth.net >
Sent: Monday, January 20, 2014 5:14 PM
Subject: Re: Furman Intramurals

Aminah, please confirm the following dates:

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Wednesday Jan. 29 > Furman Univ. > 6 & 7 pm (Games are at Herman Lay PAC Center; come in door to the left once entereing the gym; shorts are fine; fill out tax form [I'll be there]).

Thursday Jan. 30 > West Greenville Comm Center > 6 & 7 pm (8 Rochester St. (Pendleton, right on N. Textile, Queen, Center on the right.)

Rico

On Mon, Jan 20, 2014 at 1:51 PM, aminah richburg wrote:

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Aminah

From: Rico <ericowms@charter.net >
To: aminah richburg <richburga@bellsouth.net >
Sent: Monday, January 6, 2014 10:00 PM
Subject: Re: Furman Intramurals

Aminah will you help me on Thursday Jan. 16? There are three games at the Easley Rec Center ---Ct 2 -- at 6 pm. If you accept these you must block this date off in Arbiteras SOON as possible.

Rico

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On Sun, Jan 5, 2014 at 3:40 PM, aminah richburg wrote:

> I can work just need to know dates and times, based on what I receive from Arbiter.
Aminah

From: Rico <

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: YMCA Games

1 message

aminah richburg <richburga@bellsouth.net> Mon, Jul 7, 2014 at 3:38 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

I am available on July 12 all day Saturday, on July 19 & July 26 I have committed myself from 10:30 - 1:00 to teach at a tennis clinic I will be free after the clinic if there are games scheduled.
Aminah

On Thursday, July 3, 2014 9:18 PM, Rico <ericowms@charter.net> wrote:

Beginning the Saturday of July 12 and each Saturday thereafter, if you are available to officiate Middle school to JV age youth games let me know.....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Basketball games

1 message

aminah richburg <richburga@bellsouth.net> Thu, Jul 31, 2014 at 6:51 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Confirming games, just getting home and checking my email.

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Meeting Sept. 22 at Augusta Rd. Library

3 messages

Rico <ericowms@charter.net> Sun, Sep 21, 2014 at 8:27 PM

I don't believe I saw you at our District One meeting last week, and this is a reminder/notice that we will meet again tomorrow Sept. 22 at The Augusta Rd. library on Lydia St. — 6 pm.

Rico

---

aminah richburg <richburga@bellsouth.net> Mon, Sep 22, 2014 at 2:16 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico, I officiate Volleyball and Football and I will arrive late on the 22nd. I have two matches at Powdersville High School on 9/29/14 so I may not make the meeting at all. Are there any alternatives to cover any material I missed during the meetings. I drove to the main library last week when I was free and no one was there. I want to continue officiating basketball but I will need accomodations with the meetings or meet with the presenters after the fact to cover the material missed.
Aminah

[Quoted text hidden]

---

ericowms@charter.net <ericowms@charter.net> Mon, Sep 22, 2014 at 2:45 PM
To: aminah richburg <richburga@bellsouth.net>

Aminah our Director should have notified everyone but there are others that did not know also. I'm running for Director and would like your support and vote. In any case we are meeting 2nite at Augusta Rd Libray at 6 pm
Sent with Verizon Mobile Email

[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Error

1 message

aminah richburg <richburga@bellsouth.net> Mon, Oct 20, 2014 at 9:26 AM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico, I am seeking a consistent opportunity to officiate basketball in addtion to the high school league preferably on the weekend, what groups or organizations should I contact.
Aminah

On Thursday, October 16, 2014 9:31 PM, Rico <ericowms@charter.net> wrote:

Please accept my apologies as "Jay Ratterree" was unintentionally listed twice in the 'Voting Procedure Change' email. The corrected listing of Positions and Nominees are.....

The positions and nominees to be voted upon are (in alphabetical order):

Director: Kevin Brown

Jenny Norris

Rico Williams

****

Assistant Director: Dave Dendy

Ken Pelanda

****

Board Seat: (1) Charles Edens

Tom Holtz

Gary Hullinger

Jay Ratterree

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Saturday games

1 message

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Fri, Dec 5, 2014 at 8:13 AM

yes I am available

On Wednesday, December 3, 2014 8:41 PM, Rico <ericowms@charter.net> wrote:

Are you available to work this Saturday, Dec. 6 > at GHS YMCA (550 Brookwood Point Pl, Simpsonville) > Court Two > 1, 2, 3 & 4 pm? If so confirm.....

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Saturday games

1 message

aminah richburg <richburga@bellsouth.net> Thu, Dec 18, 2014 at 10:18 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Confirmed

On Thursday, December 18, 2014 2:20 PM, Rico <ericowms@charter.net> wrote:

Aminah: Saturday December 20 >> Adams Mill YMCA >> Court TWO >> 1, 2, 3 pm.....Confirmed??

Rico

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Upcoming Games

2 messages

aminah richburg <richburga@bellsouth.net> Tue, Jan 6, 2015 at 1:10 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico , I am available on 1/12/15 - Bob scheduled a game for me on 1/13/15 , I have not received anymore games in arbiter, it would be nice if he scheduled them for the rest of the month but he has not what do you recommend?
Aminah

On Tuesday, January 6, 2015 12:32 PM, Rico <ericowms@charter.net> wrote:

If you are available to officiate any evenings each Monday through Thursday beginning next Monday, Jan. 12th through Thursday, Jan. 29th let me know via email soon as possible. Further details will follow....

Rico

aminah richburg <richburga@bellsouth.net> Tue, Jan 6, 2015 at 1:19 PM
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Rico I am not available on the 1/12/15, let me know if Bob should have games scheduled In advance, I never find out my games until the week before. Right now, I am available on 19,21, 26,27,28
[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Black Arm Bands

5 messages

Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Thu, Jan 15, 2015 at 10:32 AM

The management of First Team Sports has informed me that they will have the black arm bands we have requested the early part of next week – probably Tuesday Jan. 20 or Wednesday Jan. 14. They will notify me once the order has come in and I will in turn notify you. You will then be able to visit the store (2520 Wade Hampton Blvd. Greenville) and pick up one at your convenience. Also remember that the District is covering the cost.

Rico

---

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Thu, Jan 15, 2015 at 1:58 PM

Rico , can you tell me where and what time will I officiate ball games on January 19, 2015 and January 21, 2015
Aminah

[Quoted text hidden]

Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Thu, Jan 15, 2015 at 4:21 PM

Aminah I didn't say that I would schedule you for those dates -- only for your availability. However, please confirm this schedule for the next few days:

Sat. Jan. 17>>> Adams Mill YMCA >> COURT ONE >> 11, 12, 1 pm

Wed. Jan. 21 >>> Park Ave Gym (On Church St.) 6, 7, 8 pm.

Rico

[Quoted text hidden]

---

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Fri, Jan 16, 2015 at 9:01 AM

Yes Rico, I am confirming January 17 and January 21
Aminah

[Quoted text hidden]

Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Fri, Jan 16, 2015 at 1:39 PM

Aminah, there's been a change. Please go instead to GHS YMCA (Brookwood) at 1, 2, 3 pm. Confirm.....

Rico

[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Spring Basketball Tournaments

1 message

aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Fri, Mar 6, 2015 at 8:19 AM

I would like to officiate Rico. (April Dates - Only)
Aminah Richburg

On Thu, 3/5/15, Rico <ericowms@charter.net> wrote:

Subject: Spring Basketball Tournaments
To: "Rico Williams" <Ericowms@charter.net>
Date: Thursday, March 5, 2015, 8:38 PM

There will be four basketball tournaments at the new Upward Sports complex in Spartanburg SC. The dates are March 27-29, April 3-5, April 10-12 and April 24-26; and if you are interested in officiating in these tournaments let me know via email.

Rico Williams
(864) 430-9884
Ericowms@charter.net

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Meeting Venue Change

2 messages

Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net> Thu, Jan 8, 2015 at 12:01 AM

District 1 colleagues,

With due respect to Jenny, I am disseminating this information in order to expedite its delivery. The scheduled mid-season meeting on January 11th WILL NOT be held at the Hughes Main Library. It will instead be held at the GREENVILLE HIGH SCHOOL AUDITORIUM (1 Vardry St. Greenville, SC 29601). Although I was told in September that this date would be available for us, and after Steward Lawrence and I signed the necessary papers the first part of last week, a conflict has arisen concerning another group that was given all three rooms. And after contacting several venues suitable for us, the authorities at Greenville High have consented to our assembling there. Therefore on January 11, enter through the gymnasium and you will be directed to the auditorium for our 2 pm meeting. There may not be an LCD projector nor a laptop available for our use.

After I was given the task of handling a suitable memorial (black arm bands) for Larry Williams a couple of days ago, the contacts I made simply would not have had enough time to order them in advance of our Sunday meeting. The best deal I got was $4 per band with a minimum order of 12 to be delivered next week. These would be solid black with no embroidery as we lost another brother, Steve Brown, since November; and letters on the bands would mean more costs. Continue letting me know if you desire to purchase one so I can have a definite count by Sunday.

"Officially Yours",

Rico

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net> Mon, Mar 23, 2015 at 12:12 PM

Rico, I hope you are well, I responded to your email about the upcoming tournaments are you planning to schedule my participation for the weekend of April 4, 2015, April 11, 2015 , April 25, 2015 or any other upcoming events.
Aminah Richburg
[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Upward Stars Tournament

1 message

aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net> Tue, Mar 31, 2015 at 8:09 AM

I will be available.
On Mon, 3/30/15, Rico <ericowms@charter.net> wrote:

Subject: Upward Stars Tournament
To: "Rico Williams" <Ericowms@charter.net>
Date: Monday, March 30, 2015, 10:56 PM

The next tournament
at Upward Stars will be this Friday and Saturday (April 3
& 4). If you spoke with anyone that worked the
first tournament this past weekend then you'll know that
the officials enjoyed special amenities, security, a private
room and great basketball at a brand new first class
facility.
If you are willing to commit to working
there this weekend let me know as soon as possible
via email. Some officials have
committed to officiating at Upward this weekend weeks ago,
and if you are not one of the early responders to this email
in the next day or two and I do not subsequently have games
for you, I will contact others that may be having
tournaments in this area in order to possibly accommodate
you.
Thank you for your
cooperation!

Rico Williams(864) 430-9884Ericowms@charter.net

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Re: Upward: Battle In The Burg

1 message

aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>

Thu, Apr 2, 2015 at 9:37 AM

Confirmed - Aminah for Friday
On Wed, 4/1/15, Rico <ericowms@charter.net> wrote:

Subject: Upward: Battle In The Burg
To: "Aminah A. Richburg" <richburga@bellsouth.net>, "James Craig" <jkcraig222@yahoo.com>, "Rico Williams" <Ericowms@charter.net>
Date: Wednesday, April 1, 2015, 7:46 PM

I had hoped their would be at least
four games Friday but there are
three on each court, and I have 3 officials working each
court which
means everybody gets two games. Short are fine and I
will pay you
Friday night. Saturday's schedule will be out
shortly.....

PLEASE CONFIRM.....

Rico

COURT TWO

5:30 pm Aminah R. & James C.
6:45 pm Aminah R. & Rico W.
8:00 pm James C. & Rico W.

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Weekend Tournament

4 messages

Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Tue, Apr 14, 2015 at 11:23 AM

If you are available for working a tournament this weekend in Greenville (Saturday and Sunday) let me know via email or text; and thank you for your response.....

Rico Williams

---

aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Tue, Apr 14, 2015 at 10:10 PM

Im available
Aminah
On Tue, 4/14/15, Rico <ericowms@charter.net> wrote:

Subject: Weekend Tournament
To: "Rico Williams" <Ericowms@charter.net>
Date: Tuesday, April 14, 2015, 11:23 AM
[Quoted text hidden]

Rico <ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Wed, Apr 15, 2015 at 6:32 PM

Thanks
[Quoted text hidden]

---

aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Fri, Apr 17, 2015 at 12:53 PM

Rico have you scheduled me for this weekend.
Aminah
On Tue, 4/14/15, Rico <ericowms@charter.net> wrote:

Subject: Weekend Tournament
To: "Rico Williams" <Ericowms@charter.net>
Date: Tuesday, April 14, 2015, 11:23 AM

[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Tournament This Weekend

3 messages

Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Mon, Apr 20, 2015 at 7:56 PM

There will be yet another tournament at the new facility in Spartanburg right off of I-85 -- Upward Stars -- this Friday, Saturday, and Sunday. There seems to other tournaments going as well. Whew! Basketball has really exploded in this and other areas and it seems lots of people are making a good piece of change off of us except.....you fill in the blank. That's another subject for another time.

Please send me your availabilities for all three days this weekend, and as you make this momentous decision on where to go remember, Upward gives the officials security, a room to ourselves and food! (smile).

Rico Williams
Associate Director
SCBOA District One
(864) 430-9884
Ericowms@charter.net

---

aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Tue, Apr 21, 2015 at 12:55 PM

I am available Saturday and Sunday
On Mon, 4/20/15, Rico <ericowms@charter.net> wrote:

Subject: Tournament This Weekend
To: "Rico Williams" <Ericowms@charter.net>
Date: Monday, April 20, 2015, 7:56 PM
[Quoted text hidden]

Ericowms <Ericowms@charter.net>
To: aminah richburg <richburga@bellsouth.net>
Tue, Apr 21, 2015 at 4:58 PM

I have received your contact and thank you

Sent from my Verizon Wireless 4G LTE smartphone
[Quoted text hidden]

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Greenville Tournament May 1-3

2 messages

Rico <ericowms@charter.net>
To: Rico Williams <Ericowms@charter.net>
Sun, Apr 26, 2015 at 9:08 AM

A local tournament named for Curtis Harkness being held as part of a National Organization will take place the weekend of May 1-3. Please send me your specific availabilities if applicable.....

Rico

---

aminah richburg <richburga@bellsouth.net>
To: Rico <ericowms@charter.net>
Mon, Apr 27, 2015 at 3:20 PM

I am available for the tournament.
Aminah
On Sun, 4/26/15, Rico <ericowms@charter.net> wrote:

Subject: Greenville Tournament May 1-3
To: "Rico Williams" <Ericowms@charter.net>
Date: Sunday, April 26, 2015, 9:08 AM
[Quoted text hidden]

Appellate Exhibit 40 South Carolina Secretary of State Mark Hammond Business Entities Online;

South Carolina Secretary of State Mark Hammond

Business Entities Online

File, Search, and Retrieve Documents Electronically

Business Name Search

To Search

Enter the business name of the company you wish to view and click "Search." Find the business in the results below and click to view the official business profile and relevant information.

To File for an Existing Business

Enter the business name of the company for which you wish to file documents and click search. Find the business in the results below and click to view the official business profile. From your business's profile click the "Add Filing" button.

Results displayed will show entities that contain your search criteria.

Search by Business Name

South Carolina High School League

This name is currently being used

Search Results

Displaying 1 record(s)

Entity Name	Date of Incorporation	Entity Type	Entity Status	Incorporated State
SOUTH CAROLINA HIGH SCHOOL LEAGUE	01/20/1984	Nonprofit	Good Standing	South Carolina

For filing questions please contact us at 803-734-2158

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Appellate Exhibit 41 South Carolina Code of Laws Title 33 Corporations, Partnerships and Associations Chapter 31 South Carolina Non Profit Corporation Act Section 33-31-140; Section 33-31-141; Section 33-31-302, Section 33-31-601; Section 33-31-610, Section 33-31-611, Section 33-31-620; Section 33-31-621; Section 33-31-622; Section 33-31-630; Section 33-31-640; Section 33-31-701; Section 33-31-702; Section 33-31-703; Section 33-31-704; Section 33-31-705; Section 33-31-706, Section 33-31-707, Section 33-31-708; Section 33-31-720

SECTION 33-31-140. Definitions.

Unless the context otherwise requires;

(1) "Approved by the members" or "approval by the members" means approved or ratified by the members entitled to vote on the issue through either:

(a) the affirmative vote of a majority of the votes of the members represented and voting at a duly held meeting at which a quorum is present or the affirmative vote of the greater proportion including the votes of any required proportion of the members of any class as the articles, bylaws, or this chapter may provide for specified types of member action; or

(b) a written ballot or written consent in conformity with this chapter.

(2) "Articles of incorporation" or "articles" include amended and restated articles of incorporation and articles of merger.

(3) "Board" or "board of directors" means the individual or individuals vested with overall management of the affairs of the domestic or foreign corporation, irrespective of the name by which the individual or individuals are designated, except that no individual or group of individuals is the board of directors because of powers delegated to that individual or group pursuant to Section 33-31-801(c).

(4) "Bylaws" means the code or codes of rules, other than the articles, adopted pursuant to this chapter for the regulation or management of the affairs of the corporation irrespective of the name or names by which the rules are designated.

(5) "Class" refers to a group of memberships which have the same rights with respect to voting, dissolution, redemption, and transfer. For the purpose of this section, rights are considered the same if they are determined by a formula applied uniformly.

(6) "Conspicuous" means so written that a reasonable person against whom the writing is to operate should have noticed it. For example, printing in italics or boldface or contrasting color or typing in capitals or underlined is conspicuous.

(7) "Corporation" means public benefit, mutual benefit, and religious corporation.

(8) "Delegates" means those persons elected or appointed to vote in a representative assembly for the election of a director or directors or on other matters.

(9) "Deliver" includes mail.

(10) "Directors" means natural persons, designated in the charter or bylaws or elected by the incorporators, and their successors and natural persons elected or appointed to act as members of the board, irrespective of the names or titles by which these persons are described.

(11) "Distribution" means the direct or indirect transfer of assets or any part of the income or profit of a corporation to its members, directors, or officers. The term does not include:

(a) the payment of compensation in a reasonable amount to its members, directors, or officers for services rendered;

(b) conferring benefits on its members in conformity with its purposes; or

(c) repayment of debt obligations in the normal and ordinary course of conducting activities.

(12) "Domestic corporation" means a corporation.

(13) "Effective date of notice" is defined in Section 33-31-141.

(14) "Employee" includes an officer but not a director. A director may accept duties that make him also an employee.

(15) "Entity" includes corporation and foreign corporation; business corporation and foreign business corporation; profit and nonprofit unincorporated association; corporation sole; business trust, estate partnership, trust, and two or more persons having a joint or common economic interest; and state, United States, and foreign government.

(16) "File", "filed", or "filing" means filed in the office of the Secretary of State.

(17) "Foreign corporation" means a corporation organized under a law other than the law of this State which would be a nonprofit corporation if formed under the laws of this State.

(18) "Governmental subdivision" includes authority, county, district, and municipality.

(19) "Includes" denotes a partial definition.

(20) "Individual" includes the estate of an incompetent individual.

(21) "Internal Revenue Code" means the Internal Revenue Code of 1986, or any future federal tax code or succeeding statute of like tenor and effect, and any reference to a section of the Internal Revenue Code also shall mean the corresponding section of any future federal

tax code.

(22) "Means" denotes a complete definition.

(23)(a) "Member" means a person entitled, pursuant to a domestic or foreign corporation's articles or bylaws, without regard to what a person is called in the articles or bylaws, to vote on more than one occasion for the election of a director or directors or any other matter which under the terms of this chapter requires approval by the members.

(b) A person is not a member by virtue of any of the following:

(A) any rights the person has as a delegate;

(B) any rights the person has to designate or appoint a director or directors; or

(C) any rights the person has as a director.

(24) "Membership" refers to the rights and obligations a member has pursuant to a corporation's articles, bylaws, and this chapter.

(25) "Mutual benefit corporation" means a domestic corporation which either is formed as a mutual benefit corporation pursuant to Sections 33-31-201 through 33-31-207, is designated a mutual benefit corporation by a statute, or does not come within the definition of public benefit or religious corporation.

(26) "Notice" is defined in Section 33-31-141.

(27) "Person" includes any individual or entity.

(28) "Principal office" means the office, in or out of this State, so designated in the articles of incorporation, application for certificate of authority, or in a notice of change of principal office filed pursuant to either Section 33-31-505 or 33-31-1515 where the principal office of a domestic or foreign corporation is located.

(29) "Proceeding" includes civil suit and criminal, administrative, and investigatory action.

(30) "Public benefit corporation" means a domestic corporation which is formed as a public benefit corporation pursuant to Sections 33-31-201 through 33-31-207 or is required to be a public benefit corporation pursuant to Section 33-31-1707.

(31) "Record date" means the date established under Sections 33-31-601 through 33-31-640 or Sections 33-31-701 through 33-31-730 on which a corporation determines the identity of its members and their membership rights for the purposes of this chapter. The determinations must be made as of the time of close of transactions on the record date unless another time for doing so is specified at the time the record date is fixed.

(32) "Religious corporation" means a domestic corporation which is formed as a religious corporation pursuant to Sections 33-31-201 through 33-31-207 or is required to be a religious corporation pursuant to Section 33-31-1707.

(33) "Secretary" means the corporate officer to whom the board of directors has delegated responsibility under Section 33-31-840(b) for custody of the minutes of the directors' and members' meetings and for authenticating the records of the corporation.

(34) "State", when referring to a part of the United States, includes a state and commonwealth, and their agencies and governmental subdivisions, and a territory, and insular possession, and their agencies and governmental subdivisions of the United States.

(35) "United States" includes district, authority, bureau, commission, department, and any other agency of the United States.

(36) "Vote" includes authorization by written ballot and written consent.

(37) "Voting power" means the total number of votes entitled to be cast on the issue at the time the determination of voting power is made, excluding a vote which is contingent upon the happening of a condition or event which has not occurred at the time. Where a class is entitled to vote as a class for directors, the determination of voting power of the class must be based on the percentage of the number of directors the class is entitled to elect out of the total number of authorized directors.

HISTORY: Former Section 33-31-140 [1962 Code Section 12-762; 1952 Code Section 12-762; 1942 Code Section 8165; 1932 Code Section 8165; Civ. C. '22 Section 4351; Civ. C. '12 Section 2869; Civ. C. '02 Section 1909; 1900 (23) 390]; 1994 Act No. 384, Section 1.

SECTION 33-31-141. Notice.

(a) Notice may be oral or written.

(b) Notice may be communicated in person; by telephone, telegraph, teletype, facsimile transmission (FAX), or other form of wire or wireless communication; or by mail or private carrier. If these forms of personal notice are impracticable, notice may be communicated by a newspaper of general circulation in the area where published; or by radio, television, or other form of public broadcast communications.

(c) Oral notice is permissible if reasonable under the circumstances and is effective when communicated if communicated in a comprehensible manner. Oral notice also includes notice through broadcast transmission.

(d) Written notice, if in a comprehensible form, is effective at the earliest or the following:

(1) when received;

(2) five days after its deposit in the United States mail, if mailed correctly addressed and with first class postage affixed;

(3) on the date shown on the return receipt, if sent by registered or certified mail, return receipt requested, and the receipt is signed by or on behalf of the addressee;

(4) fifteen days after its deposit in the United States mail, if mailed correctly addressed and with other than first class, registered, or certified postage affixed.

(e) Written notice is correctly addressed to a member of a domestic or foreign corporation if addressed to the member's address shown in the corporation's current list of members.

(f) A written notice or report delivered as part of a newsletter, magazine or other publication regularly sent to members constitutes a written notice or report if addressed or delivered to the member's address shown in the corporation's current list of members, or in the case of members who are residents of the same household and who have the same address in the corporation's current list of members, if addressed or delivered to one of such members, at the address appearing on the current list of members.

(g) Written notice is correctly addressed to a domestic or foreign corporation, authorized to transact business in this State, other than in its capacity as a member, if addressed to its registered agent or to its secretary at its principal office shown in its most recent Notice of Change of Principal Office and if none has been filed, in its articles of incorporation or application for certificate of authority.

(h) If Section 33-31-705(b) or any other provision of this chapter prescribes notice requirements for particular circumstances, those requirements govern. If articles or bylaws prescribe notice requirements, not inconsistent with this section or other provisions of this chapter, those requirements govern.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-302. General powers.

Unless its articles of incorporation provide otherwise, every corporation has perpetual duration and succession in its corporate name and has the same powers as an individual to do all things necessary or convenient to carry out its affairs including, without limitation, power:

(1) to sue and be sued, complain, and defend in its corporate name;

(2) to have a corporate seal, which may be altered at will, and to use it, or a facsimile of it, by impressing or affixing or in any other manner reproducing it;

(3) to make and amend bylaws not inconsistent with its articles of incorporation or with the laws of this State for regulating and managing the affairs of the corporation;

(4) to purchase, receive, lease, or otherwise acquire, and own, hold, improve, use, and otherwise deal with, real or personal property or any legal or equitable interest in property, wherever located;

(5) to sell, convey, mortgage, pledge, lease, exchange, and otherwise dispose of all or any part of its property;

(6) to purchase, receive, subscribe for, or otherwise acquire, own, hold, vote, use, sell, mortgage, lend, pledge, or otherwise dispose of, and deal in and with, shares or other interest in or obligations of any entity;

(7) to make contracts and guaranties, incur liabilities, borrow money, issue notes, bonds, and other obligations, and secure any of its obligations by mortgage or pledge of any of its property, franchises, or income;

(8) to lend money, invest and reinvest its funds, and receive and hold real and personal property as security for repayment, except as limited by Section 33-31-832;

(9) to be a promoter, partner, trustee, member, associate, or manager of any partnership, joint venture, trust, or other entity. When acting as a trustee of a trust in which it has a beneficial interest, the corporation is not conducting a trust business with regard to that trust for purposes of Section 34-21-10;

(10) to conduct its activities, locate offices, and exercise the powers granted by this chapter within or without this State;

(11) to elect or appoint directors, officers, employees, and agents of the corporation, define their duties, and fix their compensation;

(12) to pay pensions and establish pension plans, pension trusts, and other benefit and incentive plans for any or all of its current or former directors, officers, employees, and agents;

(13) to make donations not inconsistent with law for the public welfare or for charitable, religious, scientific, or educational purposes and for other purposes that further the corporate interest;

(14) to accept gifts, devises, and bequests subject to any conditions or limitations, contained in the gift, devise, or bequest so long as the conditions or limitations are not contrary to this chapter or the purposes for which the corporation is organized;

(15) to impose dues, assessments, and admission and transfer fees upon its members;

(16) to establish conditions for admission of members, admit members, and issue memberships;

(17) to carry on a business;

(18) to do all things necessary or convenient, not inconsistent with law, to further the activities and affairs of the corporation.

HISTORY: 1994 Act No. 384, Section 1; 1999 Act No. 24, Section 1.

ARTICLE 6

Members and Memberships

Subarticle A

Admission of Members

SECTION 33-31-601. Admission.

(a) The articles or bylaws may establish criteria or procedures for the admission of members.

(b) No person may be admitted as a member without his consent.

HISTORY: 1994 Act No. 384, Section 1.

Types of Memberships - Members' Rights and Obligations

SECTION 33-31-610. Differences in rights and obligations of members.

All members have the same rights and obligations with respect to voting, dissolution, redemption, and transfer, unless the articles or bylaws establish classes of membership with different rights or obligations. All members have the same rights and obligations with respect to any other matters, except as set forth in or authorized by the articles or bylaws.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-611. Transfers.

(a) Except as set forth in or authorized by the articles or bylaws, no member of a mutual benefit corporation may transfer a membership or any right arising therefrom.

(b) No member of a public benefit or religious corporation may transfer a membership or any right arising therefrom.

(c) Where transfer rights have been provided, no restriction on them is binding with respect to a member holding a membership issued before the adoption of the restriction unless the restriction is approved by the members and the affected member.

Resignation and Termination

SECTION 33-31-620. Resignation.

(a) A member may resign at any time.

(b) The resignation of a member does not relieve the member from any obligations the member may have to the corporation as a result of obligations incurred or commitments made before resignation.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-621. Termination, expulsion, and suspension.

(a) No member of a public benefit or mutual benefit corporation may be expelled or suspended, and no membership or memberships in such corporations may be terminated or suspended except pursuant to a procedure that is fair and reasonable and is carried out in good faith.

(b) A procedure is fair and reasonable when either:

(1) the articles or bylaws set forth a procedure that provides:

(i) not less than fifteen days prior written notice of the expulsion, suspension, or termination and the reasons therefore; and

(ii) an opportunity for the member to be heard, orally or in writing, not less than five days before the effective date of the expulsion, suspension, or termination by a person or persons authorized to decide that the proposed expulsion, termination, or suspension not take place; or

(2) it is fair and reasonable taking into consideration all of the relevant facts and circumstances.

(c) Any written notice given by mail must be given by first class or certified mail sent to the last address of the member shown on the corporation's records.

(d) A proceeding challenging an expulsion, suspension, or termination, including a proceeding in which defective notice is alleged, must be commenced within one year after the effective date of the expulsion, suspension, or termination.

(e) A member who has been expelled or suspended may be liable to the corporation for dues, assessments, or fees as a result of obligations incurred or commitments made before expulsion or suspension.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-622. Purchase of memberships.

(a) A public benefit or religious corporation may not purchase any of its memberships or any

right arising therefrom.

(b) A mutual benefit corporation may purchase the membership of a member who resigns or whose membership is terminated for the amount and pursuant to the conditions set forth in or authorized by its articles or bylaws. No payment shall be made in violation of Article 13.

HISTORY: 1994 Act No. 384, Section 1.

Subarticle D

Derivative Suits

SECTION 33-31-630. Derivative suits.

Derivative suits may be maintained on behalf of South Carolina corporations in federal and state court in accordance with the applicable rules of civil procedure.

HISTORY: 1994 Act No. 384, Section 1.

Subarticle E

Delegates

SECTION 33-31-640. Delegates.

(a) A corporation may provide in its articles or bylaws for delegates having some or all of the authority of members.

(b) The articles or bylaws may set forth provisions relating to:

(1) the characteristics, qualifications, rights, limitations, and obligations of delegates including their selection and removal;

(2) calling, noticing, holding, and conducting meetings of delegates; and

(3) carrying on corporate activities during and between meetings of delegates.

HISTORY: 1994 Act No. 384, Section 1.

ARTICLE 7

Members Meetings and Voting

Subarticle A

Meetings and Action Without Meetings

SECTION 33-31-701. Annual and regular meetings.

(a) A corporation with members shall hold a membership meeting annually at a time stated in or fixed in accordance with the bylaws.

(b) A corporation with members may hold regular membership meetings at the times stated in or fixed in accordance with the bylaws.

(c) Annual and regular membership meetings may be held in or out of this State at the place stated in or fixed in accordance with the bylaws. If no place is stated in or fixed in accordance with the bylaws, annual and regular meetings must be held at the corporation's principal office.

(d) At the annual meeting:

(1) The president and chief financial officer shall report on the activities and financial condition of the corporation; and

(2) Unless this chapter or the articles of incorporation or bylaws require otherwise, notice of an annual meeting need not include a description of the purpose for which the meeting is called.

(e) At regular meetings, the members shall consider and act upon matters as raised consistent with provisions of the articles of incorporation or bylaws and, in addition, with the notice requirements of this chapter.

(f) The failure to hold an annual or regular meeting at a time stated in or fixed in accordance with a corporation's bylaws does not affect the validity of a corporate action.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-702. Special meetings.

(a) A corporation with members shall hold a special meeting of members:

(1) on call of its board or the person or persons authorized to do so by the articles or bylaws; or

(2) except as provided in the articles or bylaws of a religious corporation, if the holders of at least five percent of the voting power of any corporation sign, date, and deliver to any corporate officer one or more written demands for the meeting describing the purpose or purposes for which it is to be held.

(b) The close of business on the thirtieth day before delivery of the demand or demands for a special meeting to any corporate officer is the record date for the purpose of determining whether the five percent requirement of subsection (a) has been met.

(c) If a notice for a special meeting demanded under subsection (a)(2) is not given pursuant to Section 33-31-705 within thirty days after the date the written demand or demands are delivered to a corporate officer, regardless of the requirements of subsection (d), a person signing the demand or demands may set the time and place of the meeting and give notice pursuant to Section 33-31-705.

(d) Special meetings of members may be held in or out of this State at the place stated in or fixed in accordance with the bylaws. If no place is stated or fixed in accordance with the bylaws, special meetings must be held at the corporation's principal office.

(e) Only those matters that are within the purpose or purposes described in the meeting notice required by Section 33-31-705 may be conducted at a special meeting of members.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-703. Court-ordered meeting.

(a) The court of common pleas of the county where a corporation's principal office in this State or, if none in this State, its registered office, is located may summarily order a meeting to be held:

(1) on application of a member or other person entitled to participate in an annual or regular meeting, and in the case of a public benefit corporation, the Attorney General, if an annual meeting was not held within the earlier of six months after the end of the corporation's fiscal year or fifteen months after its last annual meeting; or

(2) on application of a member or other person entitled to participate in a regular meeting, and in the case of a public benefit corporation, the Attorney General, if a regular meeting is not held within forty days after the date it was required to be held; or

(3) on application of a member who signed a demand for a special meeting valid under Section 33-31-702, a person or persons entitled to call a special meeting and, in the case of a public benefit corporation, the Attorney General, if:

(i) notice of the special meeting was not given within thirty days after the date the demand was delivered to a corporate officer; or

(ii) the special meeting was not held in accordance with the notice.

(b) The court may fix the time and place of the meeting, specify a record date for determining members entitled to notice of and to vote at the meeting, prescribe the form and content of the meeting notice, fix the quorum required for specific matters to be considered at the meeting, or direct that the votes represented at the meeting constitute a quorum for action on those matters, and enter other orders necessary to accomplish the purpose or purposes of the meeting.

(c) If the court orders a meeting, it may also order the corporation to pay the member's costs, including reasonable counsel fees, incurred to obtain the order.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-704. Action by written consent.

(a) Unless limited or prohibited by the articles or bylaws, action required or permitted by this chapter to be approved by the members may be approved without a meeting of members if the action is approved by members holding at least eighty percent of the voting power. The action must be evidenced by one or more written consents describing the action taken, signed by those members representing at least eighty percent of the voting power, and delivered to the corporation for inclusion in the minutes or filing with the corporate records.

(b) If not otherwise determined under Section 33-31-703 or 33-31-707, the record date for determining members entitled to take action without a meeting is the date the first member signs the consent under subsection (a).

(c) A consent signed under this section has the effect of a meeting vote and may be described as such in any document filed with the Secretary of State.

(d) Written notice of member approval pursuant to this section must be given to all members who have not signed the written consent. If written notice is required, member approval pursuant to this section is effective ten days after the written notice is given.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-705. Notice of meeting.

(a) A corporation shall give notice consistent with its bylaws of meetings of members in a fair and reasonable manner.

(b) Any notice that conforms to the requirements of subsection (c) is fair and reasonable, but other means of giving notice also may be fair and reasonable when all the circumstances are considered. However, notice of matters referred to in subsection (c)(2) must be given as provided in subsection (c).

(c) Notice is fair and reasonable if:

(1) the corporation notifies its members of the place, date, and time of each annual, regular, and special meeting of members no fewer than ten or if notice is mailed by other than first class or registered mail, thirty, nor more than sixty days before the meeting date;

(2) notice of an annual or regular meeting includes a description of any matter that must be approved by the members under Section 33-31-831, 33-31-856, 33-31-1003, 33-31-1021, 33-

31-1104, 33-31-1202, 33-31-1401, or 33-31-1402; and

(3) notice of a special meeting includes a description of the matter for which the meeting is called.

(d) Unless the bylaws require otherwise, if an annual, regular, or special meeting of members is adjourned to a different date, time, or place, notice need not be given of the new date, time, or place, if the new date, time, or place is announced at the meeting before adjournment. If a new record date for the adjourned meeting is or must be fixed under Section 33-31-707, however, notice of the adjourned meeting must be given under this section to the members of record as of the new record date.

(e) When giving notice of an annual, regular, or special meeting of members, a corporation shall give notice of a matter a member intends to raise at the meeting if:

(1) requested in writing to do so by a person entitled to call a special meeting; and

(2) the request is received by the secretary or president of the corporation at least ten days before the corporation gives notice of the meeting.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-706. Waiver of notice.

(a) A member may waive any notice required by this chapter, the articles, or bylaws before or after the date and time stated in the notice. The waiver must be in writing, be signed by the member entitled to the notice, and be delivered to the corporation for inclusion in the minutes or filing with the corporate records.

(b) A member's attendance at a meeting:

(1) waives objection to lack of notice or defective notice of the meeting, unless the member at the beginning of the meeting objects to holding the meeting or transacting business at the meeting;

(2) waives objection to consideration of a particular matter at the meeting that is not within the purpose described in the meeting notice, unless the member objects to considering the matter when it is presented.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-707. Record date; determining members entitled to notice and vote.

(a) The bylaws of a corporation may fix or provide the manner of fixing a date as the record date for determining the members entitled to notice of a member's meeting. If the bylaws do not fix or provide for fixing a record date, the board may fix a future date as a record date. If

no record date is fixed, members at the close of business on the business day preceding the day on which notice is given or, if notice is waived, at the close of business on the business day preceding the day on which the meeting is held are entitled to notice of the meeting.

(b) The bylaws of a corporation may fix or provide the manner of fixing a date as the record date for determining the members entitled to vote at a member's meeting. If the bylaws do not fix or provide for fixing a record date, the board may fix a future date as a record date. If no record date is fixed, members on the date of the meeting who are otherwise eligible to vote are entitled to vote at the meeting.

(c) The bylaws may fix or provide the manner for determining a date as the record date for the purpose of determining the members entitled to exercise any rights in respect of any other lawful action. If the bylaws do not fix or provide for fixing a record date, the board may fix in advance a record date. If no record date is fixed, members at the close of business on the day on which the board adopts the resolution relating thereto, or the sixtieth day before the date of such other action, whichever is later, are entitled to exercise such rights.

(d) A record date fixed under this section may not be more than seventy days before the meeting or action requiring a determination of members occurs.

(e) A determination of members entitled to notice of or to vote at a membership meeting is effective for any adjournment of the meeting unless the board fixes a new date for determining the right to notice or the right to vote, which it must do if the meeting is adjourned to a date more than one hundred twenty days after the record date for determining members entitled to notice of the original meeting.

(f) If a court orders a meeting adjourned to a date more than one hundred twenty days after the date fixed for the original meeting, it may provide that the original record date for notice or voting continues in effect or it may fix a new record date for notice or voting.

HISTORY: 1994 Act No. 384, Section 1.

SECTION 33-31-708. Action by written or electronic ballot.

(a) Unless prohibited or limited by the articles or bylaws, any action that may be taken at any annual, regular, or special meeting of members may be taken without a meeting if the corporation delivers a written or electronic ballot to every member entitled to vote on the matter.

(b) A written or electronic ballot shall:

(1) set forth each proposed action; and

(2) provide an opportunity to vote for or against each proposed action.

(c) Approval by written or electronic ballot pursuant to this section is valid only when the

number of votes cast by ballot equals or exceeds the quorum required to be present at a meeting authorizing the action, and the number of approvals equals or exceeds the number of votes that would be required to approve the matter at a meeting at which the total number of votes cast was the same as the number of votes cast by ballot.

(d) All solicitations for votes by written or electronic ballot shall:

(1) indicate the number of responses needed to meet the quorum requirements;

(2) state the percentage of approvals necessary to approve each matter other than election of directors; and

(3) specify the time by which a ballot must be received by the corporation in order to be counted.

(e) Except as otherwise provided in the articles or bylaws, a written or electronic ballot may not be revoked.

HISTORY: 1994 Act No. 384, Section 1; 2006 Act No. 255, Section 1, eff April 8, 2006.

Effect of Amendment

The 2006 amendment added "or electronic" preceding "ballot" throughout.

Subarticle B
Voting

SECTION 33-31-720. Members' list for voting.

(a) After fixing a record date for a notice of a meeting, a corporation shall prepare an alphabetical list of the names of all its members who are entitled to notice of the meeting and shall list the members by classification of membership, if any. The list must show the address and number of votes each member is entitled to vote at the meeting. The corporation shall prepare on a current basis through the time of the membership meeting a list of members, if any, who are entitled to vote at the meeting but not entitled to notice of the meeting. This list must be prepared on the same basis and be part of the list of members.

(b) The list of members must be available for inspection by any member for the purpose of communication with other members concerning the meeting, beginning the day after notice is given of the meeting for which the list was prepared and continuing through the meeting, at the corporation's principal office or at a reasonable place identified in the meeting notice in the city where the meeting will be held. A member, a member's agent, or member's attorney is entitled on written demand to inspect and, subject to the limitations of Sections 33-31-1602(c) and 33-31-1605, to copy the list, at a reasonable time and at the member's expense, during the period it is available for inspection.

(c) The corporation shall make the list of members available at the meeting, and any member, a member's agent, or member's attorney is entitled to inspect the list at any time during the meeting or any adjournment.

(d) If the corporation refuses to allow a member, a member's agent, or member's attorney to inspect the list of members before or at the meeting, or copy the list as permitted by subsection (b), the court of common pleas of the county where a corporation's principal office in this State or, if none in this State, its registered office, is located, on application of the member, may summarily order the inspection or copying at the corporation's expense and may postpone the meeting for which the list was prepared until the inspection or copying is complete and may order the corporation to pay the member's costs, including reasonable counsel fees, incurred to obtain the order.

(e) Unless a written demand to inspect and copy a membership list has been made under subsection (b) before the membership meeting and a corporation improperly refuses to comply with the demand, refusal or failure to comply with this section does not affect the validity of action taken at the meeting.

(f) The articles or bylaws of a religious corporation may limit or abolish the rights of a member under this section.

(g) A member may inspect and copy the membership list only if (i) his demand is made in good faith and for a proper purpose; (ii) he describes with reasonable particularity his purpose; and (iii) the list is directly connected with his purpose.

2013-14
APPLICATION FOR MEMBERSHIP
SOUTH CAROLINA BASKETBALL OFFICIALS ASSOCIATION
PO BOX 211575
COLUMBIA, SC 29221-6575
www.schsl.org/scboa.htm

Highlight any new or changed information from previous year
All Transfers and New Officials MUST submit their application to the Local Director!
(Please type or print)

District 1 Number Years' Experience _____
Name Richburg (Last) Aminah (First) Alecea (Middle)
Mailing Address 217 Plum Creek Lane
City Greenville State SC Zip 29607
Home Phone (864) 289-9733 Work Phone (864) 355-2711
Cell Phone (864) 419-6707 Other Phone ( )
Date of Birth 05/10/1967 Occupation Educator
E-mail address arichbur@greenville.k12.sc.us Social Security # 086-58-7018
High School Area in Which You Live Mauldin
Are You A High School Graduate? Yes SC High School Attended Southside
Were you a member of SCBOA last year? No
Were you previous member of SCBOA? No If yes, what years? _____
NEW MEMBERS: List all previous experience as a basketball official: _____

DUES:

Members who register before April 1st $50.00*
Included in the dues are the following items:
SCBOA dues $10.00
SCHSL Administrative fees $23.00
NFOA Insurance fee $17.00

Members last year who register after March 31 ..... $80.00*
In addition to the above the following is included:
Late fee $30.00

A member who resigns before October 15 will be refunded ½ the regular dues (1/2 of $50); any member who resigns after October 15 will not receive a refund.

No application shall be accepted after October 15 except for transfers.

* Deduct $17.00 from that if NFOA dues have already been paid.

MAKE CHECK PAYABLE TO: SOUTH CAROLINA BASKETBALL OFFICIALS ASSOCIATION
Highlight any new or changed information from previous year

Check one of the following. No selection will invalidate your application.
[x] I have **NOT** been convicted or pled guilty to any felony.
[ ] I **HAVE** been convicted or pled guilty to a felony. ***(Application must be forwarded to District Director)***

Date 7/26/2013 Signature Aminah A. Richburg
All Transfers and New Officials MUST submit their application to the Local Director!

Appellate Exhibit 43 All Rico Williams, Memos, Memorandums, Responses, Answers to Appellate;

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	)	IN THE COURT OF COMMON PLEAS Civil Action No. 2016-CP-23-02113
AMINAH A. RICHBURG, Plaintiff, vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, Defendants.	)	**DEFENDANT'S SECOND SUPPLEMENTAL ANSWERS TO PLAINTIFF'S FIRST SET OF CONTINUING INTERROGATORIES**

TO: AMINAH RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

Defendant E.A. "Rico" Williams ("Defendant") herein supplements his responses to Plaintiff's First Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure. Defendant repeats and reasserts herein all objections previously raised in response to Plaintiff's First Set of Continuing Interrogatories.

INTERROGATORIES

11. Provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico" Williams on February 5, 2016 at 1:49 pm.

RESPONSE: **Defendant objects to this request on the grounds that it is overly broad, and also vague to the extent it seeks the "affiliations" of such individuals. Subject to and without waiving this objection, Defendant will supplement this response with a list of the SCBOA Board members and their addresses, to the extent known.**

SUPPLEMENTAL RESPONSE: SCBOA Board members, as of February 2016, were:

1. William ("Al") Banister
   114 Forrester Creek Drive
   Greenville, SC 29607

2. Kevin Brown
   147 Warrenton Way
   Simpsonville, SC 29681

3. Audrey Cox
   305 A East Lee Road
   Taylors, SC 29687

4. David Dendy
   113 Yorkshire Drive
   Greenville, SC 29615

5. Gary Hullinger
   665 Robert P. Jeanes Road
   Easley, SC 29640

6. Stewart Lawrence
   240 Baucom Park Drive
   Greer, SC 29650

7. James W. Meekins Jr.
   216 Cheddington Dr.
   Greenville, SC 29607

8. Ken Pelanda
   3 Jester Court
   Simpsonville, SC 29681

9. Robert (Bob) Wnukowski
   641 Canterbury Road
   Piedmont, SC 29673

10. E.A. ("Rico") Williams
    # 1 Ridgeside Court
    Greenville, SC 29617

16. Provide the documentation of the South Carolina High School League/ SCBOA District One Board Members present for the meeting on February 29, 2916 along with arrival times including the members individual vote/ termination for the Plaintiff.

RESPONSE:

Defendant will supplement this response upon receipt of the meeting minutes, from which the information sought may be obtained.

SUPPLEMENTAL RESPONSE: **The minutes of the Board meeting that was held on February 29, 2016 have previously been produced. (Williams 00017). The attendees are noted by their initials under the word "Present" on the minutes. There is no record of arrival times for the Board members who attended the meeting.**

TURNER PADGET GRAHAM & LANEY, P.A.

October 28, 2016

By: Sarah Day Hurley

Sarah Day Hurley (S.C. Bar #16241)
Post Office Box 1509
200 East Broad Street, Suite 250
Greenville, South Carolina 29602
Telephone: 864-552-4651
Facsimile: 864-282-5965
E-mail: shurley@turnerpadget.com

Attorney for Defendant E.A. "Rico" Williams

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF GREENVILLE	)	Civil Action No. 2016-CP-23-02113
AMINAH A. RICHBURG,	)	
Plaintiff,	)	
vs.	)	
E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE,	)	**DEFENDANT'S THIRD SUPPLEMENTAL ANSWERS TO PLAINTIFF'S FIRST SET OF CONTINUING INTERROGATORIES**
Defendants.	)	

TO: AMINAH RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

Defendant E.A. "Rico" Williams ("Defendant") herein supplements his responses to Plaintiff's First Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure. Defendant repeats and reasserts herein all objections previously raised in response to Plaintiff's First Set of Continuing Interrogatories.

INTERROGATORIES

8. The Defendant E.A. "Rico" Williams must provide a list of all organizations and dates he assigned games for the Plaintiff for the past (3) years

RESPONSE: **Defendant will conduct a reasonable search for the requested documents, and to the extent any such documents are located, will supplement the response herein and make the records available for copying and/or inspection.**

SUPPLEMENTAL RESPONSE: **(i) Golden Strip YMCA, (ii) Latino League, and (iii) City Recreational League. Defendant would further refer Plaintiff to document entitled "Non-SCBOA basketball games assigned to Aminah Richburg," which is marked "Williams 00016" and was produced to Plaintiff on September 1, 2016, and contains this information. In addition to the organizations identified on that**

document, Mr. Williams believes he may have given Plaintiff one assignment at Furman University, but does not have a record of that. Mr. Williams has searched but has not been able to locate his calendar for 2014, so is unable to provide the dates of any non-SCBOA assignments to Plaintiff during 2014.

16. Provide the documentation of the South Carolina High School League/ SCBOA District One Board Members present for the meeting on February 29, 2916 along with arrival times including the members individual vote/ termination for the Plaintiff.

RESPONSE:

Defendant will supplement this response upon receipt of the meeting minutes, from which the information sought may be obtained.

SUPPLEMENTAL RESPONSE: The minutes of the Board meeting that was held on February 29, 2016 have previously been produced. (Williams 00017). The attendees are noted by their initials under the word "Present" on the minutes. There is no record of arrival times for the Board members who attended the meeting.

SECOND SUPPLEMENTAL RESPONSE: In addition to the attendees identified on the Board minutes (Williams 00017), Defendant has confirmed that Board member Audra Cox was also in attendance. Mr. Williams does not know why her presence was not noted on the minutes.

TURNER PADGET GRAHAM & LANEY, P.A.

October 31, 2016

By: Sarah Day Hurley

Sarah Day Hurley (S.C. Bar #16241)
Post Office Box 1509
200 East Broad Street, Suite 250
Greenville, South Carolina 29602
Telephone: 864-552-4651
Facsimile: 864-282-5965
E-mail: shurley@turnerpadget.com
Attorney for Defendant E.A. "Rico" Williams

STATE OF SOUTH CAROLINA COUNTY OF GREENVILLE	)	IN THE COURT OF COMMON PLEAS Civil Action No. 2016-CP-23-02113
AMINAH A. RICHBURG, Plaintiff, vs. E.A. "RICO" WILLIAMS, DIRECTOR DISTRICT ONE SC BASKETBALL OFFICIALS ASSOCIATION AND THE SOUTH CAROLINA HIGH SCHOOL LEAGUE, Defendants.	)	**DEFENDANT'S FOURTH SUPPLEMENTAL ANSWERS TO PLAINTIFF'S FIRST SET OF CONTINUING INTERROGATORIES**

TO: AMINAH RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

Defendant E.A. "Rico" Williams ("Defendant") herein supplements his responses to Plaintiff's First Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure. Defendant repeats and reasserts herein all objections previously raised in response to Plaintiff's First Set of Continuing Interrogatories.

INTERROGATORIES

13. Provide documentation of all schools that blocked the Plaintiff and the Schools the Plaintiff blocked for South Carolina High School League/SCBOA District One officiating services for all sports for District One.

RESPONSE: Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

SUPPLEMENTAL RESPONSE: Subject to the Protective Order entered by the Court on December 8, 2016, and without waiving the objections above, Defendant

would refer Plaintiff to document marked SCHSL 011 produced by defendant South Carolina High School League.

17. Provide documentation of all ten officials communicated by E.A. "Rico" Williams that blocked the Plaintiff in the South Carolina High School League/ SCBOA District One.

RESPONSE: Defendant objects to this Interrogatory to the extent such information is confidential. Defendant will refer to the co-defendant, South Carolina High School League, which he understands will produce this information upon entry of a Protective Order.

SUPPLEMENTAL RESPONSE: Subject to the Protective Order entered by the Court on December 8, 2016, and without waiving the objections above, Defendant refers Plaintiff to Confidential document marked Williams 00038 produced herewith.

TURNER PADGET GRAHAM & LANEY, P.A.

January 18, 2017

By: Sarah Day Hurley

Sarah Day Hurley (S.C. Bar #16241)
Post Office Box 1509
200 East Broad Street, Suite 250
Greenville, South Carolina 29602
Telephone: 864-552-4651
Facsimile: 864-282-5965
E-mail: shurley@turnerpadget.com
Attorney for Defendant E.A. "Rico" Williams

GREENVILLE COUNTY
SCHOOLS
Where enlightening strikes
Lynn P. Gibbs, Executive Director
Human Resources

US MAIL AND EMAIL

December 15, 2016

Aminah A. Richburg
217 Plum Creek Lane
Greenville, SC 29607

Dear Ms. Richburg:

This comes to notify you that your employment records have been subpoenaed by Attorney Sarah D. Hurley, Attorney at Law with Turner Padget Graham and Laney P.A. located in Greenville, SC. The material will be sent on Wednesday, January 4, 2017.

Sincerely,

Lynn P. Gibbs

Lynn P. Gibbs
Executive Director, Human Resources

301 Camperdown Way · P.O. Box 2848
Greenville, South Carolina 29602
864.355.3974 · 864.355.9207 fax
greenville.k12.sc.us

Gmail

Aminah Richburg <aminaha.robinson@gmail.com>

Officials Representative of the the SCHSL Executive Committee

1 message

ArbiterSports <messaging@arbitersports.com> Mon, Feb 22, 2016 at 9:43 PM
Reply-To: Ericowms@charter.net
To: richburga@bellsouth.net

Officials,
The names have been narrowed down and we have our finalists. Please click on the link, or copy and paste it into your browser so you can vote for your officials rep. Each official has one vote, and all votes must be in by 2-28-16. Please share with your fellow officials and encourage them all to vote.

https://www.surveymonkey.com/r/HYJGM8S

Rico

Appellate Exhibit 44 Email Respondent Rico Williams to Appellate, February 5, 2016;

Aminah A. Richburg

On Friday, February 5, 2016 12:49 PM, "ericowms@charter.net" <ericowms@charter.net> wrote:

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me. On Wednedsday Feb 3, I left the same message as well as a text. After you subsequently called me back I mentioned to you that the games I scheduled for you to work Thursday, Feb. 4 at Furman's Intramural Program were indeed still on, and I informed you that someone at your last game at Beck Middle School on Feb. 2 had told me that you were officiating with "jogging/workout" type pants that were very tight. If you remember, last year during the JV tournament I asked you to wear your official's pants instead of those "jogging" pants whenever you're representing District One and you said you would. When I asked you was that report accurate from Monday you replied, "I don't wear jogging pants. Is that all?" I then asked you if it was problematic for you with me asking that question and your response was, "I don't wear jogging pants. I'm at work. Is that all?" I then stated that we talk again soon.

Even though your responses were short, terse and rude I was going to let the matter rest for another day; until after a few minutes you sent me a lengthy text which follows, and I quote: " Please discontinue the harrassing communications. Previous District One leaders presented a higher level of professionalism which made officating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulatesthe District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL".

I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked of by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept . 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 1/2 meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1 member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc. it is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route that you deem favorable.

Regards,

E.A."Rico"Williams
Director, District 1
SC Basketball Officials Association
(864 430-9884
Ericowms@charter.net

Appellate Exhibit 45 2015-2016 SCBOA Officials Manual;

SOUTH CAROLINA BASKETBALL OFFICIALS ASSOCIATION

2015 - 2016

OFFICERS

PRESIDENT ..... SIDNEY GRAY
VICE PRESIDENT ..... MARC TINDAL
SECRETARY ..... PAUL BEHR
PAST PRESIDENT ..... SHELDON BOLDS
OFFICIALS REPRESENTATIVE ..... JOEDY MOOTS
COMMISSIONER ..... SKIP LAX

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2015 - 2016 CALENDAR

NOVEMBER 14	ANNUAL BUSINESS MEETING ANNUAL EXAM SPRING VALLEY HIGH SCHOOL
NOVEMBER 16	OFFICIALS EXAM - 6:00 PM LEAGUE OFFICE
NOVEMBER 30	FIRST BASKETBALL GAME
MARCH 5	STATE FINALS - AAAA - CAROLINA CENTER
MARCH 6	STATE FINALS - A, AA, AAA - CAROLINA CENTER
MARCH 31	RATINGS & RENEWAL APPLICATION FOR MEMBERSHIP DUE
NOVEMBER 13, 2016	ANNUAL BUSINESS MEETING ANNUAL EXAM

2015 STATE CHAMPIONSHIP GAME OFFICIALS

AAAA Girls	Derrill Dilworth	Alfred Hammons	Sherman Hickson
AAAA Boys	Andy Pope	Eugene Sessoms	Dave Dendy
AAA Girls	John Trice	Fred Jordan	Lynn Ceaser
AAA Boys	Doug Jones	Bryan Lipscomb	Kevin Brown
AA Girls	Mickie Wagoner	Carol Bodie	Al Walker
AA Boys	Steven Rice	Eddie Price	Lawrence Watson
A Girls	Rodd Pedrick	Jerome Boyce	Tommy Stribble
A Boys	Kenneth Duncan	Joedy Moets	Esau Johnson

2014 STATE CHAMPIONSHIP GAME OFFICIALS

AAAA Girls	Steven Rice	Tim Lindler	Tim Forman
AAAA Boys	Andy Pope	Joedy Moots	Roosevelt Hollman
AAA Girls	Sheldon Bolds	Rodd Pedrick	Jackie Huffman
AAA Boys	Robbie Boland	Damond Tillman	Jon Garand
AA Girls	Nathaniel Sowell	Eugene Sessoms	Jake Rosiek
AA Boys	Franklin Goodwin	Ken Pelanda	Richie Jeffcoat
A Girls	Perry Ramicone	John Hill	Joseph Manigault
A Boys	Stacey Franklin	Brian Shealy	Danny Rhodes

NORTH VS SOUTH ALL-STAR GAME OFFICIALS

	BOYS			
1966	Bob Berry	Howard Burmester	Dee Nanney	J. T. Owens
1967	T. A. Edens	Alva Phillips	Jack Schuler	James Shannon
1968	J. H. Blake	E. R. Nelson	Jerry Parris	W. A. Swain
1969	J. R. Braswell	W. F. Latorre	S. O. Owens	J. M. Smoak
1970	J. F. Carter	Don Dean	A. E. Madden	C. L. McCord
1971	Alvin Kelley	J. A. Craft	Ray Lyles	G. L. Shier
1972	W. D. Avant	J. U. Farrar	T. C. Fosberry	C. C. Dailey
1973	W. R. Cummings	E. C. Owens		
1974	J. H. Lamb	D. D. Dodge	M. B. Wish	T. M. Tipton
1975	J. C. Elliott	C. D. Carson	C. M. Tanner	J. L. Johnson
1976	W. D. Carr	R. K. Littleton	O. E. Sullivan	M. C. Rogerson

	BOYS			GIRLS	
1977	B. F. Mccoy	J. T. Halford		J. C. Elliott	W. D. Carr
	O. Coan	T. L. Williams			
1978	No game			No game	
1979	R. D. Taylor	R. C. Hicks		J. K. Weyman	L. M. Rowland
1980	G. K. Shealy	B. S. Stewart		G. K. Shealy	R. Barrett
1981	O. T. Gray	J. K. Weyman		S. O. Owens	R. K. Littleton
1982	R. W. King	A. L. James		T. F. Hill	K. E. Wright
1983	J. M. Brown	S. H. Jones		G. J. Fowler	Q. M. Wood
1984	J. T. Owens	W. E. Brinson		T. F. Hill	L. E. Myers
1985	D. C. Livingston	L. M. Rowland		W. M. Spillane	D. R. Woodbury
1986	L. P. Garris	A. C. Spearman		S. J. Pace	W. James
1987	T. R. Gorman	L. Foster		J. E. Brunson	D. W. Barrow
1988	J. N. Bell	J. C. Robinson		B. J. Giles	J. E. Phillips
1989	T. C. Stribble	S. M. Derr		D. M. Hudson	J. B. Owens
1990	W. L. Williams	D. W. Parker	W. C. Lucas	W. T. Pearson	R. E. Holdway	W. Morgan
1991	P. E. Duggins	F. Pearson	L. Owens	J. F. Overcash	B. R. Pointer	P. R. Casto
1992	C. H. Porter	W. R. Hilliard	M. L. Brown	M. B. Hope	M. H. Guerry	D. R. Falls
1993	M. B. Shealy	E. R. Nelson,Jr.	D. M. Tate	M. D. Owens	M. H. Collins	G. James
1994	D. C. Sadler	D. Kent	D. P. James	R. E. Lee	J. B. Calliham	G. A. Stefanides
1995	M. E. Simmons	T. M. Moore	M. Hamrick	J. W. Bennett	T. L. Steinert	R. G. Durrell
1996	I. F. Lempke	C. E. Bridwell	H. Neeley	K. O. McCoy	S. Berry	W. J. Way
1997	W. H. Peter	L. A. Scott	J. R. Bush	P. T. Mack	A. Dawkins	K. M. Vincent
1998	D. Dendy	J. M. Cheadle	D. A. Pitts	J. L. Moots	D. D. Troutman	D. J. Denton
1999	B. Tumblin	W. Pope	T. Burton	J. L. Brown	J. Long	D. Newsome
2000	W. C. Seawright	G. R. Miller	J. E Schroll	B. P. Fink	A. H. Stevens	H. J. Way
2001	F. Goodwin	D. J. O'Keefe	J. E. Thomas	F. O. Bryant	R. R. Wellborn	J. C. Trice
2002	J. Huff	P. Ramicone	G. Sessoms	R. Boland	C. Bodie	J. Hughes
2003	P. Behr	R. Harrison	M. Williams	B. Benton	M. Hallinquest	E. McKnight
2004	A. Pope	B. Jackson	E. Price	L. Ceasar	T. Hinton	S. Hickson
2005	K. Walters	D. Rhodes	C. Smith	J. Thomason	C. Hill	C. Cummings
2006	G. McQueen	S. Rice	A. Hammons	F. Jordan	M. Bryant	E. Johnson
2007	D. Dilworth	T. Lindler	J. Manigault	AC Lewis	J. Hill	J. Boyce
2008	R. Pedrick	S. Courtright	J. Rosiek	J. Norris	F. Hill	C. McKnight
2009	J. Hagan	E. Halliday	K. Pelanda	D. Chappell	K. Cummings	M. McIntyre
2010	K. Duncan	E. Lee	S. Figuerora	L. Pursifull	P. Eckert	K. Ritter
2011	J. Garand	T. Kriner	E. Richards	A. Poirer	J. Eckman	Z. Morris
2012	B. Lipscomb	P. Murphy	R. Williams	M. Gatewood	A. Latimer	D. Warren

SOUTH CAROLINA / NORTH CAROLINA ALL-STAR GAME OFFICIALS

1998	S. H. Jones	D. Barrow	B. F. McCoy
1999	D. C. Sadler	T. C. Stribble	D. R. Falls
2000	D. S. Waldrep	C. H. Porter	W. L. Williams
2001	B. Morris	T. H. Hinton	J. N. Bell
2002	S. Gray	W. James	M. William
2003	M. Brown	H. Manigault	B. McCoy
2004	C. Duncan	M. Owens	B. Fink
2005	J. Way	J. Parris	J. Jones
2006	M. Price	R. Ellis	R. Rhodes
2007	R. Scriven	R. Weldon	T. Richberg
2008	R. Hollmon	D. Sullen	S. Bolds
2009	E. Johnson	G. Simmons	N. Sowell
2010	B. McGinn	C. Smith	J. Manigault
2011			
2012			
2013			

CONSTITUTION

Article I NAME

This organization shall be known as the South Carolina Basketball Officials Association (SCBOA).

Article II PURPOSE

A. The training and development of basketball officials.
B. The maintenance of a booking office for high schools, prep schools, and others desiring our services.

Article III DISTRICTS

The territory embracing the residence of members shall be divided into eight or more districts as stated in the By-Laws.

Article IV OFFICERS AND DIRECTORS

A. The officers of the Association shall be one president, one vice president, and one secretary.
B. The directors shall be fifteen in number, to-wit: three officers, the nine directors without office, the Commissioner, the Executive Director of the South Carolina High School League, and the immediate past president of the Association, who shall be an ex-officio director for one year.

Article V ELECTIONS

A. The president and vice president shall be elected annually by the board of directors at a regular meeting of the board. The presidency shall be alternated between the upper and lower state. The upper state districts shall be districts 1, 2, 3, 4 and 10. The lower state districts shall be 5, 6, 7, 8, 9, 11 and 12.
B. All districts shall be entitled to representation on the board of directors through the election to the board of one member from each district.
C. No district shall be entitled to have more than one member from that district serving on the board of directors at any time, except the immediate past president of the Association serving as an ex-officio director as provided in Article IV.
D. To hold the office of president or vice president, one must have been a certified basketball official in South Carolina for a period of at least four years.
E. To hold the office of district director, one must be a certified official in the Association during each year of his term of office.

Article VI BOARD OF DIRECTORS

A. The board of directors shall act in an advisory capacity to the president; shall entertain and cause to be thoroughly investigated written complaints against any member of the Association and shall take what action it may deem advisable.
B. The board of directors shall have full power to adopt all regulations to govern its deliberations.
C. The board of directors shall determine eligibility tests on applicants for membership.

Article VII GENERAL

The qualifications for membership and the duties of officers and directors, and regulations as may be necessary and proper for the conduction of business and affairs of the Association shall be provided in the By-Laws.

Article VIII AMENDMENTS TO THE CONSTITUTION

The constitution may be amended at the annual meeting by an affirmative vote of three-fourths of the votes cast, or by mail ballot of three-fourths of the votes cast, provided that copies of the amendment have been mailed to each member at least 30 days prior to the time the vote is taken.

BY-LAWS

Article I THE PRESIDENT

The President shall preside at all meetings of the Association and the Board of Directors. He may vote as a district director. He shall conduct all business on behalf of the association and shall make every effort to further the policy adopted by the association.

Article II THE VICE PRESIDENT

The vice president shall perform the duties of the president in his absence or inability to act.

Article III THE SECRETARY

The secretary shall keep the minutes of all meetings of the Association.

Article III A THE DIRECTOR

The director is a representative of one of the twelve geographical districts. The director has full power of office, i. e., the director may vote, make motions, speak for or against items of agenda, and must be present to cast a vote on behalf of the district. Any district not represented by its duly elected director may be represented by a substitute or supply director appointed by the director. Such appointment shall be in writing, dated and signed by the director. The substitute will have full power of office, i. e., the substitute may vote, make motions, speak for or against items of agenda.

Article IV THE COMMISSIONER OF OFFICIALS

A. The Executive Committee of the South Carolina High School League shall appoint the Commissioner of Officials. He shall have charge of all records pertaining to the business of the Association.

B. The Commissioner shall receive all applications for membership, which have been approved or disapproved by the director of the district where the applicant resides and the Commissioner shall notify the applicant of the approval or rejection of his application. If the applicant is approved for membership, the Commissioner shall furnish the applicant with a copy of the Constitution, By-Laws, and booking office regulations.

C. The Commissioner shall maintain in his office all reports and records of the members of the Association and the record of an official shall be available to such official at such reasonable time as may be agreed upon by the individual and the Commissioner.

D. The Commissioner shall keep a record of all game assignments and schedules of member schools and shall, upon request of the athletic director or coach of a school, furnish to such school a list of all officials, together with information, which in the opinion of the Commissioner might be relevant in making an impartial and proper selection of game officials.

E. The Commissioner shall furnish each member school a list of the officials.

Article V DISTRICTS

The territory embracing residences of members shall be divided into districts as follows:

1. Greenville and Pickens	7. Allendale, Bamberg, Barnwell, Calhoun, Hampton, and Orangeburg
2. Cherokee, Spartanburg, and Union	8. Beaufort, Berkeley, Charleston, Colleton, Dorchester, and Jasper
3. Chester, Fairfield, Lancaster, and York	9. Clarendon, Kershaw, Lee, and Sumter
4. Abbeville, Greenwood, Laurens, McCormick, Newberry, and Saluda	10. Anderson and Oconee
5. Lexington, Richland	11. Georgetown, Horry, and Williamsburg
6. Chesterfield, Darlington, Dillon, Florence Marion and Marlboro	12. Aiken and Edgefield

Article VI ELECTION OF DIRECTORS

The members of the district at a regular district meeting shall elect the director for each district. Proper notice shall be given to all members of the district notifying them of the date elections are to be held. Such notice shall be given at least two weeks before the date of the election. Directors shall be elected so that they will be rotated on a three-year basis. Districts 1, 4, 7, and 10 will be elected one year. Districts 2, 5, and 8 will be elected the next year and districts 3, 6, 9, 11 & 12 the third year.

Should a director be unable to complete his term, a new director will be elected to replace him from that district and the director so elected will serve for three years. Any director, when elected, will serve three full years even though this may alter the rotation system above.

The President, Vice-President and Secretary shall take office on July 1st and their terms shall end the following June 30th. Likewise newly elected District Directors shall take office on July 1st and their terms shall end on June 30th, three years later.

Elections for Vice-President and Secretary shall take place at the March BOD meeting.

The Board of Directors shall meet quarterly to conduct the business of the SCBOA. (This is normally the second Monday in July, the first Monday in October, the second Monday in January, and the Saturday morning of the State Finals.)

Article VII MEMBERSHIP

A. A membership year shall begin on April 1 and end on the same date the next year following.

B. Annual membership dues shall be computed as follows: $10 for the association plus a fee charged by the South Carolina High School League which covers administrative costs, books, membership in the NFOA and NFOA insurance. This fee shall be set each season by the SCHSL.

C. The deadline for submitting renewal applications shall be March 31st. In addition, the Official Peer Rating is due by March 31st. Renewal applications postmarked after March 31st shall be considered late. A late fee of $30 shall be charged and a **one** point rating deduction shall be assessed. Applications will not be processed until all monies owed are received.

D. If a basketball official is also a member of the South Carolina Football Officials Association, he is a member of NFOA and may deduct the NFOA insurance fee from the above fees. Dues will be paid directly to the South Carolina Basketball Officials Association.

E. October 15th shall be the cutoff date for accepting any applications, with the exception of transfer-ins.
F. The director and the district's local review board shall review all officials who are members of the district and are members of the South Carolina Basketball Officials Association for the first or second year. The director and the review board will be authorized to reject the renewal application of any first or second year official if they feel that it is in the best interest of the Association.
G. An official with 3 through 6 years experience and a rating below 75 or an official with 7 years or more and a rating below 85 will be placed on probation for 1 year. If this condition should exist a second time, the official may be dropped from the Association.

Article VIII OFFICIAL'S FEES

Deleted

Article IX GENERAL RULES OF CONDUCT

A. No member shall accept any in-state high school engagement unless the Association headquarters in Columbia assigns him. The district director may make assignments to non-member schools, Junior Varsity, B-team and middle schools regular season games.
B. Any member who violates the provisions of the constitution and by-laws may be suspended for such length of time, as the board of directors of this Association may deem wise and proper.

Article X DISCIPLINE OF OFFICIALS

Discipline of officials shall be handled through the Commissioner of Officials and the Board of Directors.

Article XI UNIFORMS

A. Each official shall have a complete standard uniform, which shall be as follows:
   1. Black and white vertically striped v-neck short sleeve knit shirt. Straight leg black trousers without cuffs. (Trousers may be pleated or plain.)
   2. Black officials shoes (if low cut shoes are worn, officials must wear black socks). A black shoe with a white trim may be worn if all officials wear them.
   3. Black jacket made of wool or nylon, without a hood, and with or without a waistband.
B. The SCBOA or any district may, as a memorial, place a patch or band on the shirt sleeve opposite the sleeve with the US flag for a period of up to one year, for each memorial situation.

Article XII OFFICIATING MECHANICS

All members shall conform to the mechanics and procedures prescribed in the officials' manual published by the National Federation of State High School Associations.

Article XIII CANCELLATIONS AND POSTPONEMENTS

Deleted.

Article XIV RESPONSIBILITIES OF OFFICIALS

A. Any official who fails to fill his appointment will pay the home school the amount of the fee that he was to receive.

B. The Referee shall contact their crew in advance of the assignment.

C. Any official who does not accept his/her assignments by ArbiterSports.com's Accept-by date will be replaced.

D. Any official that declines an assignment less than 14 days before an assignment (and he had not previously been released on that date) or accepts an assignment and then turns the game back to the booking office less than 14 days before the assignment, shall have one point deducted from cooperation under the rating system, except in case of extreme emergency. (To be determined by the Board of Directors)

E. Releases for dates other than those listed in the release form sent in before the season starts must be obtained at least three days before the assignments leave the booking office.

F. Collect telephone calls to the booking office by any official will be refused unless previously authorized by the booking office. Directors making required calls to the league office might be reimbursed for these calls provided that they furnish a verification of the calls at the end of the season.

G. Grooming standards shall be as follows:

1. No hair shall touch the shirt collar or extend over the ear
2. No sideburns below the lowest part of the ear lobe.
3. No facial-hair other than a neatly trimmed mustache, which shall not extend lower than the edges of the mouth.

Article XV PHYSICAL EXAMINATION

Officials are required to have an annual physical.

If the official meets the physical requirements for officiating, the physician will sign the following: "I have examined the official and find that he meets the physical requirements for activities as a basketball official." The Association will accept its own form, any other physical form with the above statement or the above statement properly signed on any form or letter.

By the scheduled date of the officials' examination, each district director will turn in to the booking office the required physical form.

Officials who do not turn in their physical forms on or before the date of the exam will have a **one** point rating deduction and will not be assigned until after January 1st.

No physical forms will be accepted after the second Monday following the regularly scheduled statewide exam and any official who has not turned in a physical by then will be dropped from the Association.

Article XVI RULES CLINICS / WRITTEN EXAMINATION

A. The League will conduct six basketball rules clinics. It is mandatory that all basketball officials attend one of these clinics.

B. To be certified, each official must take a written examination on rules and mechanics.

C. Officials who are members of the South Carolina Basketball Officials Association for the first year do not have to make a passing grade on the examination.

D. Officials who have been members of the South Carolina Basketball Officials Association for one or more years must score 70 or above on the examination. If any such official scores less than 70, he will be required to study and then take another exam prior to December 15. The officials must make 70 or above on the second try to be eligible for assignments to varsity games.

E. Officials shall be required to take the written examination on rules and mechanics on the scheduled date. Officials who do not take the written examination on the scheduled date must take a make-up exam.

F. The last date to take the exam is the second Monday following the statewide exam. If an official takes the makeup exam on the Monday following the statewide exam, they will be fined **$25.00** and have **two** points deducted from their officials rating. If they take the makeup exam anytime between Tuesday and the following Monday (second Monday following the statewide exam), they shall be fined **$25.00** and have an **additional two** points (for a total of four) deducted from their officials rating. Officials who have not taken the exam by the second Monday following the statewide exam shall be dropped from the Association.

   a. One point will be deducted from the officials rating for failure to attend a statewide clinic.

Article XVII REVIEW BOARDS

A. A local review board of not less than three officials shall be appointed by each director. The duties and responsibilities of the board shall be as follows:

   1. Each year the local review board and the district director shall review the records of all officials in the district with one or two year's experience in the Association in accordance with Article VII.
   2. The local review board shall review the records of any new applicant in the district, who has acceptable experience in other states, or who was a former member of the South Carolina Basketball Officials Association but who does not have a rating. An appropriate rating for booking purposes shall be assigned to such official by this board.
   3. The local review board shall also review the records of any member with two or more years experience that may be referred to the board by the district director or the Commissioner of officials. The board may adjust the rating of such official either upward or downward or may recommend that the official be dropped from the Association.

B. A state review board of not less than five officials, selected from the Board of Directors, shall be appointed by the President. The purpose of this board will be to hear any appeals from the local review boards.

Article XVIII RATING SYSTEM

A. The officials rating used by the SCHSL in making game assignments shall be by the following rating system.

Credit Factors	Written Examination	SCBOA Credit	Officials Rating	Clinics, Exam, Training	Cooperation	Total
Maximum Points	25	25	25	20	5	100

Actual points earned are computed as follows:

Written Examination 25 times the percentage grade.

SCBOA Credit 5 points for each year of certified experience for the first five years. (Experience in other states must be confirmed in writing by the athletic association of the state in which the official was certified.)

Officials Peer Rating Ratings are submitted on a scale of 1 to 10. The average is computed and multiplied by 2.5.

Clinics, Exam & Training 20 points are earned as follows:
One point for attending an SCHSL-sponsored clinic.
Two points for attending the SCBOA exam.
One point for each of six classroom clinics prior to the season.
One point for each of two classroom clinics after the start of the season.
One point for each of two inter-school scrimmages assigned by the district director.
One point for each of two classroom clinics and/or scrimmages.
Five points for future use*

Cooperation Deduction of points are determined by the Commissioner and/or the district director. The district director may deduct up to two points.

* - All officials will receive the five points until such points are designated for specific activities

B. For District Directors, the Officials Peer Rating during their term of office shall be the higher of the following; the peer rating they came into office with or the calculated peer rating for each year.

C. Rating Adjustments for Officials.

- By a District's Local Review Board
  Can only adjust up ratings based on available experience points. If an official has not maxed out on "Experience" points, his district's local review board may adjust up an official's rating, by utilizing the available unearned experience points. Once adjusted up, it stays up (no need to re-up their rating each year). Also a point can be earned for attending a qualifying officiating camp (once earned, it stays).

- By the SCBOA Board of Directors
  All other adjustments to an official's rating, when their "Experience" points are maxed out, can only be made thru the Board of Directors.

D. An official who takes the exam, but does not officiate that season shall have their rating set by taking their previous year's rating and substituting the lower of the two exam scores (current year vs previous year) to calculate their rating for next season.

Article XIX RATING APPEAL POLICY

Deleted.

Article XX BOOKING REGULATIONS

Deleted.

Article XXI VARSITY OFFICIATING CREW STAFFING PROCEDURE

Deleted

Article XXII SCBOA BASKETBALL OFFICIALS CAMP

A. The SCBOA in partnership with the SCHSL shall develop and conduct a summer Basketball Officiating Development Camp program.

B. Deleted

C. The Camp Committee, whose members are to be designated by the Board of Directors, is granted authority to approve other camps that may serve as an acceptable qualifying substitute. Other camps that teach high school rules and mechanics can be considered for approval.

Article XXIII BY-LAW EXCEPTIONS

For an individual exception to the By-Laws, a District Director shall contact the SCBOA President. The President may, at his discretion, present the exception request to all the other Directors (in the interim between BOD meetings). If the exception request receives a two-thirds affirmative vote, the exception is approved and the President shall forward the approved exception on to the Commissioner of Officials.

SC/NC ALLSTAR GAME OFFICIALS - DISTRICT ROTATION

Year	Districts	Type of Game
1998	6, 8, 5	Boys
1999	11, 3, 4	Girls
2000	7, 2, 1	Boys
2001	12, 9, 10	Girls
2002	12, 9, 10	Boys
2003	6, 8, 5	Girls
2004	11, 3, 4	Boys
2005	7, 2, 1	Girls
2006	7, 2, 1	Boys
2007	12, 9, 10	Girls
2008	6, 8, 5	Boys
2009	11, 3, 4	Girls
2010	11, 3, 4	Boys
2011	7, 2, 1	Girls
2012	12, 9, 10	Boys

2013	6, 8, 5	Girls
2014	6, 8, 5	Boys
2015	11, 3, 4	Girls
2016	7, 2, 1	Boys
2017	12, 9, 10	Girls
2018	12, 9, 10	Boys
2019	6, 8, 5	Girls
2020	11, 3, 4	Boys
2021	7, 2, 1	Girls
2022	7, 2, 1	Boys
2023	12, 9, 10	Girls
2024	6, 8, 5	Boys
2025	11, 3, 4	Girls
2026	11, 3, 4	Boys
2027	7, 2, 1	Girls
2028	12, 9, 10	Boys
2029	6, 8, 5	Girls

SOUTH CAROLINA EXCEPTIONS TO NFHS RULES

TIMING OF BASKETBALL GAMES

This supersedes Rule 5, Section 5 for JV and "B" games

All games must start at their scheduled times. If two varsity games are being played, the first game must start no later than 7:00 P.M. The second game will begin within 20 minutes after the conclusion of the first game.

Overtime periods for all games played in quarters of less than eight minutes will be three minutes each.

All JV, "B", junior high school or middle school games will be played in four quarters of six minutes each with intermissions of one minute after first and third quarters and eight minutes between halves.

These three sections supplement Rule 1, Section 18

a. The principal of the host school will prohibit the use of loud noisemakers, i.e. cowbell, air horns, radios and musical instruments. The tournament director will forbid noisemakers during tournament play.

b. Cheerleaders must be in the bleachers except during full time-outs, end of quarters and half time. Mascots are considered cheerleaders. Megaphones for cheering purposes will be used only by cheerleaders. Jewelry will not be worn at any time. **Each school is responsible for enforcement of these regulations.**

c. Pep bands or musical entertainment may be permitted prior to the game, during halftime or following the game. Under no circumstances will any musical instruments be used at any other time.

FEES, PRACTICES & PROCEDURES

DUES & FEES

The current administrative fee charged by the South Carolina High School for rule books, case books, officiating manuals, NFOA membership and insurance and to operate the booking office is $45. When added with the $10 dues for the SCBOA the total amount is $55. If an official decides not to be a member of SCBOA for the current year after having paid the dues and fees, a refund of 50% of the dues and fees paid will be made if notification is received before October 15th of the current year. After October 15th of the current year, no refund will be given.

OFFICIALS FEES

Officials' fees for games shall be as follows:

Single Middle School (R & U)	Two Middle School (R & U)	Single JV Game (R & U)	Two JV Games (R & U)	Single Varsity Game (R, U1 & U2)	Two Varsity Games (R, U1 & U2)	State Play-Off Game (R, U1 & U2)	Two State Play-Off Games (R, U1 & U2)	State Final Game (R, U1 & U2)
$32.00	$46.00	$37.00	$55.00	$55.00	$78.00	$62.00	$85.00	$78.00

A. Conference, regional or invitational tournament game fees will be the same as column one, if the official is assigned one game or column two, if the official is assigned two games.

B. Play-off fees plus mileage apply after regional play.

C. Travel allowance for all games shall be 0.45 per mile to each official with a minimum of $9.00.

D. Officials will be furnished for the coach's association all-star games without fee, but with travel and room expenses.

CANCELLATIONS AND POSTPONEMENTS

For any game cancelled or postponed, the home team is responsible for notifying the officials assigned to the game and the booking office. If the home school fails to notify any official assigned to the game that has been postponed and the official travels to the game site, the home school shall pay each official mileage for travel actually performed (plus the game fee, if the game is cancelled).

BOOKING REGULATIONS

A. **General**

Three officials will be used in all varsity games booked by this Association. Fees and travel shall be paid in accordance with the schedule above and that listed in the High School League handbook.

A school may submit a mark-off list of not more than eight (8) officials. Officials on this list will not be assigned to any basketball game of that school. No more than 8 officials may be on a mark-off list at any given time.

When there is a problem of an official being on too many mark-off lists, the Commissioner shall scout the official, investigate, and take any action that he deems necessary.

All games on a given date will be arranged in numerical order according to anticipated importance, rivalry, relative bearing on conference standing, and other similar factors.

When priority of games has been established, the booking office will begin making

assignments with the game of most priority and will continue in numerical order until all games have been assigned.

Officials may turnback assignments without penalty if done via email (or in writing) 14 or more days prior to the assignment.

An official assigned to a game and later rejected by one of the competing schools, with less than 14 days notice, will be paid his fee by the rejecting school. If assigned to another game, the rejecting school must make up any difference in fee.

Officials certified by the high school league must be used in all varsity games. The League office will not book any regular season games below the varsity level.

Unnecessary mileage restrictions by officials shall cause the booking office to restrict assignments to that official. Officials having travel and time restrictions (after 5 p.m.) will be given last consideration in booking.

Any time restriction and/or mileage restriction, which has been in effect for more than one-half of the regular season, shall also be in effect for tournaments.

The Commissioner reserves the right to revise the above regulations in case of emergency.

Directors may charge a reasonable booking fee for the booking of JV, "B" Team, Jr. High, & Middle School games.

B. **Pre-Season & Holiday Tournaments**

The local director will assign officials for all pre-season and Christmas tournaments, JV, "B" team, Jr. High and Middle School tournaments.

C. **Regular Season**

Officials shall be limited to two SCHSL regularly booked varsity assignments per week, during the regular season.

D. **Playoffs, Conference Tournaments & State Tournament Officials**

An official must have worked at least 10 varsity assignments, booked by the SCHSL, in order to be eligible for playoff assignments.

There shall be no limit to the number of assignments an official may have per week during the playoffs.

The booking office will assign officials to all regional and conference basketball tournaments. Tournament directors may inform the booking office of no more than 6 officials that they prefer not to have.

For the State Tournament the Commissioner will make up a list of eligible officials. This list will be composed of the top 20 percent by rating of each of the 12 districts as well as the top 20 percent in the state. This list will be used to assign officials to each tournament.

State play-off finals shall be restricted to one final game for any one official.

Starting with the 2010 State Finals, no official may work more than two consecutive state finals.

VARSITY OFFICIATING CREW STAFFING PROCEDURE

In order to ensure full officiating crew at JV & Varsity games, the following procedure has been adopted.

A. The varsity crew should "pitch-in", if when they arrive and find the JV game being

officiated by one official.

B. The Junior Varsity (JV) officiating crew should remain at the game site until the full varsity crew has arrived.
C. The Referee of the varsity game may decide to use one (or two) of the officials working the JV game, provided the official(s) is certified by the SCHSL.
D. The Referee may decide to work a two man crew (or wait on the full varsity crew).

RATING APPEAL POLICY

All appeals must be in writing and include a copy of the official's rating slip. Appeals must indicate number of points deducted and how many are being appealed.

All appeals for work related reasons should be on company letterhead and from/signed by the individual's manager with the address and phone number of the manager/supervisor included.

All other appeals should also be on letterhead and/or include supporting documentation from the responsible individual (e.g., Physician, Jury Foreman/Judge, County/City Council, Law Enforcement, Military, Wedding or Funeral notice, etc).

All other appeals (late applications, turned in games, etc) should be turned in to their director as soon as possible after the incident, but in no circumstances later than June 1st.

All appeals will be made to the district director with the supporting documentation no later than May 15th. The director will then review the information and inform the member of his decision by May 22nd. If the decision is not favorable the member may appeal to the local appeals board which will render a decision by June 1st. If he does not receive a favorable appeal he may then appeal to the Board of Directors. All appeals to the Board of Directors should be sent to the BOD secretary no later than June 15th, in order to review them at the July meeting. The decision of the Board of Directors is final.

At least 2 weeks prior to the July meeting the BOD Secretary will send copies of all the appeals to the BOD to:

- The SCBOA BOD, in order to provide time for the BOD to prepare for the appeals meeting (why points were deducted, etc); and
- To each director, in order to allow time for review by each director and if there are questions, it would allow time for the questioning director to get clarification or more information from the appealee's director prior to the meeting.

All appeal votes shall be by closed ballot.

The following are excerpts taken from the South Carolina High School League Handbook

CONTEST SCHEDULED STARTING TIME

Coaches of all high school sports are requested to organize their program so that their athletic contests start at the scheduled time. Officials have been requested to be at the game in advance of the starting time.

Preliminary ceremonies are an important part of the school activity program and the coach should work with others connected with this program to see that their activities are concluded in time for the game to start as scheduled and advertised.

Varsity – JV game time conflict. Game management shall make the call whether to continue the JV contest or shorten the game. In the event that the varsity games start later than the prescribed limits above, the varsity game(s) shall be played and the matter reported to the SCHSL for their review.

CANCELING OR POSTPONING A BASKETBALL GAME

Instructions for canceling or postponing a basketball game are as follows:

1. Notify the officials assigned to the game and inform them of the date on which the game will be made up. If the home school fails to notify an official assigned to the game and the official travels to the site, the official will be paid mileage for travel performed plus the game fee.
2. Notify the league office and be prepared to inform the league that that all officials have been notified. Also inform the league whether the assigned officials will accept the game on the rescheduled date.

RESPONSIBILITIES OF THE SCHOOL

If a member school fails to furnish adequate police protection for the officials, said school is immediately placed on probation until an investigation can be made by the officials association and the South Carolina High School League. An official must report any irregular procedure of the game or any unusual conduct on the part of the crowd, coaches, school officials or students to the Executive Director of the South Carolina High School League.

Also, schools are required to provide a private meeting room for the officials prior to the games and during the intermission between games.

RESPONSIBILITIES OF THE COACH

The coach bears the greatest burden of responsibility for sportsmanship. His influence upon the attitudes and behavior of the players, the student body, and the community are unequaled. In order for good sportsmanship to become reality, it is essential that the coaches subscribe to the values of sportsmanship and teach its principles through word and deed. Coaches should:

- Always set a good example for others to follow.
- Instruct players in sportsmanship.
- Discipline students who display unsportsmanlike behavior.
- Respect the officials' judgment and interpretation of the rules.
- Be a good host to opponents.

RESPONSIBILITIES OF THE OFFICIALS

Officials should:

- Maintain a neat appearance, and be friendly but businesslike.
- Know fully the rules and accepted officiating procedures.
- Make decisions promptly, fairly, and without arrogance.
- Be consistent.
- Eliminate showboating in officiating.
- Be on time and start the game on time.
- Refrain from placing hands on players during an athletic contest.
- Work together with other officials. A pre-game conference prior to each game is a must.

POLICY, COACH-OFFICIAL RELATIONSHIP

The League's policy concerning the ethical relationship between coach and official during and immediately following an interscholastic contest is that once officials are assigned they are entitled to the active support of the coaches. Under no circumstances shall a coach attempt to publicly criticize, berate or intimidate an official.

Officials are expected to arrive on time at each game site, neatly dressed in the designated uniform. Officials should be in good physical condition, mentally ready to work the best possible game and fully cognizant of the playing rules. They are expected to hustle and to call each play as they see it without fear or favor, regardless of the score.

Officials are instructed to correct all errors if errors are made provided that they are correctable. Judgment calls on the part of officials are not subject to question or discussion. Officials are instructed to refrain from discussing judgment calls with coaches, players, or spectators.

Coaches and officials are expected to treat each other with courtesy, dignity and respect. Each should treat the other as he expects to be treated. These provisions should be carefully studied and followed.

Officials are advised that they should leave the basketball court as soon as possible following the completion of the game. This may save post-game arguments and protect those concerned from making a statement they might regret later.

REPORTING DISQUALIFICATIONS

League regulations require that officials report all disqualifications (player and coach). The player's number, school and the reason for the disqualification must be reported. It is not necessary to list the jersey color.

DISCIPLINE OF OFFICIALS

Officials associations may set up rules and regulations for the discipline of its members. The legislative assembly of the South Carolina High School League is of the opinion that the final authority of discipline for both schoolmen and athletic game officials must be centralized and that this centralized authority will be the Executive Director of the league. The Executive Director has the authority to discipline the official in one or more of the following manners:

Warning - this is an official notice that an inexcusable, unethical or unsportsmanlike action is a matter of record and must not happen again.

Probation - this is a more severe type of warning. An official on probation may be assigned to regularly scheduled games but he will not be assigned to a play-off game for a conference championship, a play-off game toward the state championship or a tournament of any type.

Suspension - a suspended official may not work an interscholastic athletic contest of any kind for a member of the South Carolina High School League or a school that is a member of another

state associated with the National Federation of State High School Athletic Associations.

Fine - a fine may be levied separately or in addition to a warning, probation or suspension. It will be levied against the official and may range from the fee received for working the game up to a maximum of $100.00. Any disciplinary action by SCBOA or the Executive Director may be appealed to the Executive Committee of the High School League.

OFFICIALS LIABILITY INSURANCE

Liability insurance is covered under NFOA membership. (Up to one million dollars individual liability protection from suits arising from officiating duties and paying for legal fees as well as any assessments or damage awards.) Medical coverage is available through the national federation office.