

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
In the Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

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JUN 19 2018

SC Court of Appeals

Case No. 2016-CP-23-02113

Appellate Case No. 2017-001147

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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.

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**RESPONDENTS' REPLY TO APPELLANT'S RESPONSE IN OPPOSITION TO THEIR  
JOINT MOTION TO REQUIRE APPELLANT TO INCLUDE RESPONDENTS'  
DESIGNATED MATTER IN THE RECORD ON APPEAL**

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Pursuant to Rule 240 and Rule 210, SCACR, Respondents submit this reply to Appellant's response in opposition to their joint motion for an order from the Court requiring Appellant to include in the Record on Appeal all items identified in Respondents' Designation of Matter.

The Court should grant Respondents' motion because Appellant failed to offer any legitimate reason for deviating from the South Carolina Appellate Court Rules governing records on appeal. The rule plainly states that "[t]he Record on Appeal shall include all matter designated to be included by any party under Rule 209 and shall comply with the requirements of Rule 267." Rule 210(c), SCACR (emphasis added). Indeed, the rule requires Appellant to "certify that the Record on Appeal contains all material proposed to be included by any of the parties and not any

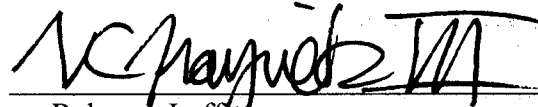
other material.” Rule 209(g), SCACR. Appellant cannot unilaterally change the rules and include only those items that seemingly favor her position. Accordingly, the Court should issue an order requiring Appellant to include all matter designated by Respondents in the Record on Appeal.

Further, Respondents request an extension for filing final briefs pending resolution of the present motion. As it stands, Respondents cannot properly cite portions of the Record on Appeal because their matter was not included in the record. Thus, Respondents respectfully request ten days after Appellant files the proper Record on Appeal to submit final briefs.

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, LLC

By:



Rebecca Laffitte

SC Bar 3105

rlaffitte@sowellgray.com

J. Michael Montgomery

SC Bar 74930

mmontgomery@sowellgray.com

Vordman Carlisle Traywick, III

SC Bar 102123

ltraywick@sowellgray.com

1310 Gadsden Street

Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

Attorneys for Respondent South Carolina High  
School League

Columbia, South Carolina

June 19, 2018

TURNER PADGET GRAHAM & LANEY, P.A.

By: *Sarah Day Hurley by VCA*  
Sarah Day Hurley  
SC Bar 16241  
Post Office Box 1509  
Greenville, SC 29602  
Telephone: (864) 552-4651  
Email: shurley@turnerpadget.com  
*with express permission*

Attorney for Respondent E.A. "Rico" Williams

Greenville, South Carolina

June 19, 2018

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v.

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

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**CERTIFICATE OF SERVICE**

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

**Pleadings:**

Respondents' Reply to Appellant's Response in Opposition to Their  
Joint Motion to Require Appellant to Include Respondents'  
Designated Matter in the Record on Appeal

**Counsel Served:**

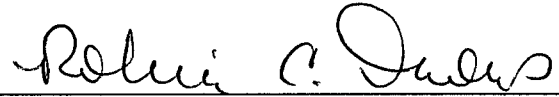
Ms. Aminah A. Richburg  
217 Plum Creek Lane  
Greenville, South Carolina 29607

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SC Court of Appeals

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



Robin C. Owens  
Legal Assistant

Columbia, South Carolina

6/19 2018.



ROBINSON  
GRAY

Litigation + Business

VORDMAN CARLISLE TRAYWICK, III

DIRECT 803.231.7810 DIRECT FAX 803.231.7873

ltraywick@robinsongray.com

June 19, 2018

Via Hand Delivery

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

Re: Aminah A. Richburg v. E.A. "Rico" Williams, Director, District  
One SC Basketball Officials Associations, and the South  
Carolina High School League  
Appellate Case No. 2017-001147  
Our File No. 5346/1536

Dear Ms. Kitchings:

Enclosed for filing are the original and seven copies of Respondents' Reply to Appellant's Response in Opposition to Their Joint Motion to Require Appellant to Include Respondents' Designated Matter in the Record on Appeal with proof of service in the above matter. Please return a filed copy to me via our courier.

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

Very truly yours,

Vordman Carlisle Traywick, III

VCT:rco  
Enclosures

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

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