

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Case No. 2016-CP-23-02113

Appellate Case No. 2017-001147

RECEIVED

OCT 18 2018

SC Court of Appeals

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

v.

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

**RESPONDENT SOUTH CAROLINA HIGH SCHOOL LEAGUE'S RETURN IN
OPPOSITION TO APPELLANT'S OCTOBER 12, 2018 MOTION**

Pursuant to Rule 240(e), SCACR, Respondent South Carolina High School League (the League) submits this return in opposition to Appellant Aminah A. Richburg's October 12, 2018 motion seeking various forms of relief. The Court should deny Appellant's motion.

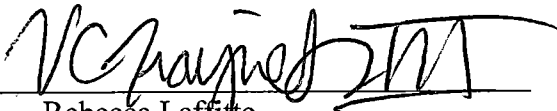
Given that it is unclear whether Appellant is calling into question the actions of both Respondents and their counsel in her motion, the League felt compelled to respond because it does not consent to the relief sought in Appellant's motion. See Rule 240(e), SCACR (noting the "[f]ailure of a party to timely file a return may be deemed consent by that party to the relief sought in the motion"). With respect to Appellant's concerns regarding the documents Respondent Rico Williams sought to be included in a supplemental record on appeal, her motion is moot in light of the Court's Order dated October 12, 2018, in which it granted the motion to supplement the record.

As to the remainder of her motion, to the extent Appellant seeks to bootstrap the League into her request for sanctions, the League would note that it was not even involved in Williams' motion to supplement the record on appeal. Counsel for Williams filed that motion solely on behalf of Williams—it was not a joint motion.¹ Indeed, the League already filed its Final Brief of Respondent on August 29, 2018. Therefore, Appellant's request for sanctions against the League for anything related to the motion to supplement the record is manifestly without merit.

The League is concerned that Appellant continues to request sanctions in almost every filing submitted to this Court. Neither the League nor its attorneys has engaged in any sanctionable conduct, and Appellant's repeated suggestions to the contrary are inappropriate and frivolous.

Respectfully submitted,

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Attorneys for Respondent South Carolina High
School League

Columbia, South Carolina
October 18, 2018

¹ The League would nevertheless note that Williams' motion was appropriate because the League did receive—during the course of discovery—the documents in question that Williams sought to include in the record on appeal.

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Associations and the South Carolina High School League. Respondents.

CERTIFICATE OF SERVICE

I, the undersigned legal assistant of the law offices of Robinson Gray Stepp & Laffitte, L.L.C., attorneys for Respondent, 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):

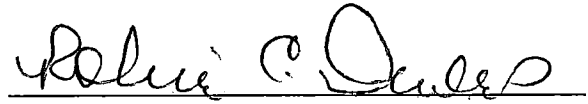
Pleadings:

Respondent South Carolina High School League's Return in Opposition to
Appellant's October 12, 2018 Motion

Counsel Served:

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

Sarah Day Hurley, Esquire
Turner Padgett Graham & Laney, P.A.
Post Office Box 1509
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A handwritten signature in black ink, appearing to read "Robin C. Owens", written over a horizontal line.

Robin C. Owens
Legal Assistant

Columbia, South Carolina

October 18, 2018



**ROBINSON
GRAY**

Litigation + Business

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ltraywick@robinsongray.com

October 18, 2018

Via Hand Delivery

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

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SC Court of Appeals

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 Respondent South Carolina High School League's Return in Opposition to Appellant's October 12, 2018 Motion 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