

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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Case No. 2016-CP-23-02113

Appellate Case No. 2017-001147

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**RECEIVED**  
OCT 22 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.

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**RESPONDENT E.A. “RICO” WILLIAMS’ RETURN IN OPPOSITION TO  
APPELLANT’S OCTOBER 12, 2018 MOTION**

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Pursuant to Rule 240(e), SCACR, Respondent Williams (“Williams”) 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.

First, Appellant’s motion is moot in light of the Court’s Order dated October 12, 2018, in which it granted Williams’ motion to file a second supplement to the record on appeal.

Second, Appellant’s request is further evidence of Appellant’s frivolous conduct in this matter. By way of background, when Appellant filed and served the Record on Appeal, she disregarded Rule 210(c), which requires Appellant to include all matters designated to be included by any party in the record on appeal. Upon motion of the Respondents, this Court ordered Appellant to file and serve a supplemental record on appeal that included all matters

designated to be included by Respondents. (See Order filed July 17, 2018). Despite the Court's Order, Appellant again deliberately omitted an item designated to be included by Respondent Williams. Appellant's refusal to abide by the Court's Order required Respondent Williams to file a second motion to supplement the record, which the Court has since granted. Appellant's conduct in this regard has been inappropriate, vexatious, and frivolous, and should not be condoned.<sup>1</sup>

For at least the reasons stated above, Appellant's renewed request for sanctions should be denied.

Respectfully submitted,

TURNER PADGET

By: Sarah Day Hurley <sup>by dwm</sup>

Sarah Day Hurley (SC Bar 16241)

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Greenville, South Carolina  
October 22, 2018

Attorneys for Respondent E.A. "Rico" Williams

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<sup>1</sup> The Court has issued numerous deficiency notices to Appellant, and Appellant's conduct has necessitated other procedural motions. For example, the Court previously granted Respondents' Motion to Strike certain designations included by Appellant because the documents were created after the entry of the trial court order granting summary judgment. (See Order filed May 9, 2018).

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South Carolina High School League..... Respondents.

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**PROOF OF SERVICE**

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I certify this 22nd day of October 2018 that I have served copies of the RESPONDENT  
RICO WILLIAMS' RETURN IN OPPOSITION TO APPELLANT'S OCTOBER 12, 2018  
MOTION TO BE INCLUDED IN THE RECORD ON APPEAL upon other counsel of record,  
by mailing same, postage prepaid in the United States mail, addressed to the following:

Aminah A. Richburg, Pro Se  
217 Plum Creek Lane  
Greenville, SC 29607  
*Appellate*

Michael Montgomery, Esquire  
P.O. Box 111449  
Columbia, SC 29211  
*Attorney for Respondent (SCHSL)*

October 22, 2018

By: Sarah Day Hurley<sup>b4</sup> RWM  
Sarah Day Hurley  
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*Attorney for Respondent E.A. "Rico" Williams*

# Turner | Padget

REPLY TO:

**Sarah Day Hurley**

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October 22, 2018

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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SC Court of Appeals

**Re: 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  
Appellate Case No. 2017-001147  
TPGL File No. 00210.01204**

Dear Madam Clerk:

Enclosed please find the original and seven copies of Respondent E.A. "Rico" Williams' Return in Opposition to Appellant's October 12, 2018 Motion to be Included in the Record on Appeal along with an original and one copy of the Certificate of Service on all other parties.

I would kindly ask that you file the original documents and return a clocked copy to me via our office courier.

As always, thank you for your assistance. With kindest regards, I am

Very truly yours,

TURNER PADGET GRAHAM & LANEY P.A.

*Sarah Day Hurley* by *rum*  
Sarah Day Hurley

SDH:kte  
Enclosure

cc: Ms. Aminah A. Richburg  
Michael Montgomery, Esq.