THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2017-001147
Civil Action No.: 2016-CP-23-02113

Aminah A. Richburg ..... Appellant,

vs.

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

FINAL BRIEF OF RESPONDENT E.A. "RICO" WILLIAMS

November 29, 2018

Sarah Day Hurley (SC Bar No. 16241)
Turner Padget Graham & Laney, P.A.
Post Office Box 1509
Greenville, SC 29602
(864) 552-4651
Attorney for Respondent
E.A. "Rico" Williams

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Rules

STATEMENT OF THE ISSUES ON APPEAL

1. DID THE CIRCUIT COURT ERR IN GRANTING SUMMARY JUDGMENT TO RESPONDENTS?
2. DID THE CIRCUIT COURT ERR IN DENYING APPELLANT'S MOTION TO COMPEL?

STATEMENT OF THE CASE

Appellant filed this lawsuit on March 31, 2016, alleging claims of defamation and negligence. Her claims arose out of a dispute between Appellant and Respondent E.A. "Rico" Williams, the Director of the District One of the South Carolina Basketball Officials Association (SCBOA). In her Complaint, Appellant claimed that Respondent Williams created a "false narrative" about Appellant's performance as a basketball referee when he reported issues involving her to the District One Board of Directors. (R. p. 17, Complaint, ¶ 15). The communication at issue is an email Williams sent on February 5, 2016 to Appellant, in response to a text message she had sent him. (R. p. 17, Complaint, ¶ 15); (R. p. 473, Email dated February 5, 2016). Williams copied members of the District One Board of Directors, along with Skip Lax, Commissioner of Officials for the SCHSL, on the email response. Several weeks after the alleged defamatory email was sent, the District One Board of Directors voted not to accept any future application by Appellant to serve as a District One basketball official. (R. p. 778, Email from Williams, dated March 21, 2016).

Appellant also alleged that the South Carolina High School League ("SCHSL"), improperly failed to investigate the situation and failed to intervene on her behalf when her membership was reviewed by the District One Board of Directors. (R. pp. 18-20, Complaint, ¶ 15).

After completion of discovery, both Respondents moved for summary judgment. Appellant had also filed a motion to compel. The court held a hearing on all motions on March 20, 2017. On April 19, 2017, the court entered its Order Granting Defendants' Motions for Summary Judgment and Denying Plaintiff's Motion to Compel. (R. pp. 1-16, April 19, 2017 Order).

STATEMENT OF FACTS

Introduction

Respondent Williams is the District One Director for the South Carolina Basketball Officials Association ("SCBOA"). (Supp. R. pp. 110-111, Williams Aff., ¶¶ 3, 10). The SCBOA is a separately created organization that operates under the South Carolina High School League ("SCBOA"). The SCBOA provides training for basketball officials; it also maintains a booking office for providing basketball officials for high schools, prep schools and others who need the services of basketball officials. (Supp. R. pp. 110-111, Williams Aff., ¶ 3). He has been a member of the SCBOA for more than 20 years, and has been the District One Director since July 2015. (Supp. R. pp. 110-111, Williams Aff., ¶ ¶ 3, 10). As is required of all SCBOA members, Williams is required to sign the SCBOA District 1 Contract, which outlines rules and regulations governing its members. Members are also bound by the Code of Ethics. (Supp. R. 111, Williams Aff., ¶ ¶ 6-9); (R. p. 769, SCBOA District 1 Contract); (R. p. 770, Code of Ethics).

Appellant first became a member of SCBOA District One for the school year 2013-2014. In 2014, she expressed an interest in officiating non-League games as well as SCBOA games, so Williams helped facilitate some of those assignments to her. Those assignments included city recreational games at the YMCA and intramural games at Furman University. Appellant earned

additional fees, outside of any fees earned by officiating League games, through these assignments. (Supp. R. p. 112, Williams Aff., ¶ 14).

District One basketball officials are required to wear a certain uniform when officiating. On February 2, 2016, another official, John Williams, informed Respondent Williams that Appellant had officiated a game earlier that day wearing "tight" jogging pants. Williams became concerned about this report because such attire is not the approved uniform for officials; Williams had previously spoken to Appellant about her failure to wear the appropriate uniform in the past. (Supp. R. p. 114, Williams Aff., ¶¶ 22-23).

Later on the afternoon of February 2, Williams called Appellant to speak to her about two things: one, he wanted to confirm that Appellant would be available to officiate a non-League game at Furman University, and two, he wanted to ask her if it was true that she had worn jogging pants to officiate a game earlier that day. (Supp. R. p. 114, Williams Aff., ¶ 24). When Appellant returned his call a few minutes later, she appeared annoyed by the phone call, and specifically, by Respondent Williams' inquiry about her attire at the game. (Supp. R. pp. 114-115, Williams Aff., ¶ 25). Shortly after the phone call, Appellant sent a text message to Respondent Williams asking him to "discontinue the harassing communications" and indicating that she was going to "communicate" his "monopoly status" to the SCHSL. (Supp. R. p. 115, Williams Aff., ¶ 26). On February 5, 2016, Respondent Williams sent a follow-up email to Appellant, on which he copied Skip Lax, the Commissioner of Officials, and the members of the SCBOA District One Board, summarizing their previous communications, and offering to assist in her transfer to another district, if she so desired. (Supp. R. p. 115, Williams Aff., ¶¶ 27-28). The February 5, 2016 email from Respondent Williams to Appellant is the basis for her defamation claim.

The Alleged Defamatory Email

The alleged defamatory email (R. p. 772-773, Williams 00004-5) is repeated verbatim below:

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me. On Wednedsday (sic) 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 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 games 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 (sic) by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are (sic) 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 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 (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 facility 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

Additional Emails Between Appellant and SCHSL

Four days after Williams had sent the email above, Appellant forwarded Williams' email to Skip Lax and asked him to intervene. Mr. Lax declined to do so. (*See* R. p. 364, Supp. R. pp. 84-87, Emails between Appellant and representatives of SCHSL). On February 16, Appellant forwarded Williams' email to Joedy Moots, the SCHSL Officials Representative, and asked him to "advise" on the matter. (*Id.*). Mr. Moots essentially advised Appellant that she should learn to work better with others. (R. p. 774, February 22, 2016 Email from Joedy Moots to Appellant). Disappointed with Mr. Moots' response, Appellant wrote to him a couple more times. Notably, on February 24, 2016, in an email to Mr. Moots (on which Respondent Williams was not copied), Appellant described Williams as "an ignorant man" who "displayed his lack of professionalism and leadership ability as the District One Director." (*Id.*, including Supp. R. p. 84, February 24, 2016 email from Appellant to Joedy Moots).

District One Board Meeting and Decision

On February 29, 2016, the District One Board of Directors met and voted not to accept Appellant's application for renewal for the year 2016-2017. (R. p. 781, Board Minutes). Although Appellant had been invited to attend the meeting, she did not do so. (R. p. 775, February 25, 2016 email from Respondent Williams to Appellant, Williams 00010). On March 21, 2016, Williams notified Appellant of the Board's decision. (Supp. R. pp. 117-118, Williams Aff., ¶ ¶ 35, 37, 38); (R. p. 778, March 21, 2016 email from Respondent Williams to Appellant, Williams 00013). Appellant did not administratively appeal the decision to the SCHSL. (Supp. R. p. 118, Williams Aff., ¶ 38). Although the District One Board decided not to accept any future applications from Appellant, Appellant continues to officiate games in other sports, such as volleyball, football, lacrosse, and softball.

STANDARD OF REVIEW ON APPEAL

The standard of review on appeal of an order granting summary judgment is the same standard under Rule 56: "In reviewing the grant of summary judgment, this Court applies the same standard that governs the trial court under Rule 56, SCRCP: 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." *Vaughan v. Town of Lyman*, 370 S.C. 436, 440, 635 S.E.2d 631, 633-34 (2006). "On appeal, all ambiguities, conclusions, and inferences arising in and from the evidence must be viewed in a light most favorable to the non-moving party." Id.

On an order denying a motion to compel, the standard of review is abuse of discretion. "A trial court's rulings in matters related to discovery generally will not be disturbed on appeal in the absence of a clear abuse of discretion." *Stokes-Craven Holding Corp. v. Robinson*, 416 S.C. 517, 536, 787 S.E.2d 485, 495 (2016). "An abuse of discretion occurs when the trial court's

order is controlled by an error of law or when there is no evidentiary support for the trial court's factual conclusions." Id.

ARGUMENT

Viewing the evidence, including any inferences to be drawn therefrom, in a light most favorable to Appellant, there can be no doubt that summary judgment was properly entered in favor of Respondent Williams.

A. The Trial Court Properly Entered Judgment in Favor of Respondent Rico Williams on the Defamation Claim.

Because the alleged defamation is based on an email, Appellant's claim is for libel. The substance of the communications that form the basis for Appellant's claim is not in dispute. The original text message that Appellant sent to Respondent Williams is set forth verbatim in the Complaint. (R. p. 19, Complaint ¶ 15.e). The email that Williams sent to Appellant, in response to her text message, was produced during discovery. (R. pp. 772-773, Williams 00004-5). Therefore, the contents of the alleged libelous communication are not in dispute. There is also no dispute that the only recipients of the email were the District One Board members and Skip Lax, the Commissioner of Officials.

1. The Statements Made by Rico Williams in the February 5, 2016 Email Were Entirely True.

In order to prevail on her claim of libel, Appellant must prove: "(1) A false and defamatory statement was made; (2) the unprivileged publication of the statement to a third party; (3) the publisher was at fault; and (4) either the statement was actionable irrespective of harm or the publication of the statement caused special harm." *Harris v. Tietex Intern'l Ltd.*, 417 S.C. 533, 540, 790 S.E.2d 411, 415 (Ct. App. 2016). Truth is an absolute defense to a claim of defamation. The defense of truth is proven "where the evidence establishes that the statement

was substantially true." *Ross v. Columbia Newspapers, Inc.*, 266 S.C. 75, 221 S.E.2d 770, 772 (1976).

Respondent Williams has presented unrefuted evidence that each of the alleged defamatory statements in his February 5th email were true when made.

(a) Statement that Appellant is Blocked by Ten Officials and Two Schools: Appellant complains that Williams defamed her when he stated that she had been blocked by ten officials and two schools. This statement was not libelous because it was true. (Supp. R. p. 116, Williams Aff., ¶ 29); (Supp. R. p. 122, Lax Aff., ¶ 12). During discovery, Respondents produced confidential documentation showing the names of the officials and schools that had blocked her. (R. p. 802, SCHSL Confidential Record of Blocks). The truth of this matter is also supported by the affidavits of Skip Lax and Respondent Williams. Appellant did not produce any documentation or witness statements to refute this information.

(b) Reports that Appellant was not open to constructive criticism:[1] Appellant also claims it was not true that other basketball officials had complained about working with her. This statement was also true when made. (Supp. R. p. 116, Williams Aff., ¶ 30). Again, Appellant did not provide any testimony or other documentation to rebut the testimony of Respondent Williams.

(c) Statement about Appellant's poor attendance at meetings. Appellant also claims that Respondent Williams defamed her by stating in his email that she had not attended all of the required basketball meetings for District One basketball officials. To prove

[1] Statements about Appellant's reputation among her peer officials are admissible. *See* South Carolina Rule of Evidence 803(21), which provides a hearsay exception for statements concerning "[r]eputation of a person's character among associates or in the community."

this statement was true, Respondent produced records kept by the District One treasurer, Kevin Brown, regarding records of meeting attendance. (Supp. R. p. 113, Affidavit of Rico Williams, ¶ 20); (R. p. 779, Williams 00014-15). Notably, Appellant also admitted in her email to Skip Lax that she failed to attend all of the required basketball meetings. (R. p. 364, February 9, 2016 email from Appellant to Skip Lax). Respondent Williams' statement was substantially true, and Appellant has offered no evidence to prove otherwise.

In responding to a properly supported Motion for Summary Judgment, the opposing party "may not rest upon the mere allegations" of her pleading, but her response "by affidavits or as otherwise provided in" Rule 56, "must set forth specific facts showing that there is a genuine issue for trial." S.C.R.Civ.P. 56(e). During this case, Appellant has not produced any evidence, either through deposition testimony or otherwise, that would show or even infer that the statements made by Respondent Williams were not true. Appellant had ample opportunity to obtain statements or affidavits from the witnesses disclosed in Respondents' discovery responses, but chose not to do so. Instead of presenting admissible evidence, Appellant has made unsubstantiated and undocumented assertions that Respondent submitted "falsified" documents and "falsified" testimony. As a pro se party, Appellant is held to the same standard as lawyers, and should not be given a "pass" simply because she chose to represent herself. "Lack of familiarity with legal proceedings is unacceptable and the court will not hold a layman to any lesser standard than is applied to an attorney." *Goodson v. American Bankers Ins. Co.*, 295 S.C. 400, 403, 368 S.E.2d 687, 689 (Ct. App. 1988).

Rule 56(e) provides that, "an adverse party may not rest upon the mere allegations or denials of his pleading, but his response, by affidavits or as otherwise provided in this rule, must

set forth specific facts showing that there is a genuine issue for trial." *S.C.R.Civ.P. 56(e).* "If he does not so respond, summary judgment, if appropriate, shall be entered against him." *Id.* Appellant did not so respond to the evidence submitted by Respondent Williams' in support of his Motion for Summary Judgment. For this reason, the court did not err in granting Respondent Williams' motion for summary judgment.

2. Rico Williams' Communications with Members of the District One Board and Skip Lax, the Commissioner of Officials, Were Privileged.

Even if the statements made by Respondent Williams in his February 5th email had not been true, summary judgment would still have been appropriate because the communications contained in Williams' email were privileged.

It is the duty of the court to determine whether a statement is privileged. *Murray v. Holnam, Inc.*, 344 S.C. 129, 542 S.E.2d 743, 749 (Ct. App. 2001) (internal citations omitted). "'While abuse of privilege is ordinarily an issue for the jury, ... in the absence of a controversy as to the facts . . . , it is for the court to say in a given instance whether or not the privilege has been abused or exceeded.'" *Id.* (quoting *Woodward v. South Carolina Farm Bureau Ins. Co.*, 277 S.C. 29, 282 S.E.2d 599 (1981).

"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." *Murray,* 542 S.E.2d at 749, citing *Constant v. Spartanburg Steel Prods., Inc.*, 316 S.C. 86, 447 S.E.2d 194 (1994) and *Prentiss v. Nationwide Mut. Ins. Co.*, 256 S.C. 141, 181 S.E.2d 325 (1971). Under the defense of conditional or qualified privilege, a defendant is not liable for the publication "if (1) the matter is published upon an occasion that makes it conditionally privileged, and (2) the privilege is not abused." *Harris v. Tietex Intern'l Ltd.*, 417

S.C. 533, 540, 790 S.E.2d 411, 415 (Ct. App. 2016). "The party asserting a qualified privilege must prove the following elements: (1) good faith, (2) an interest to be upheld, (3) a statement limited in its scope to this purpose, (4) a proper occasion, and (5) publication in a proper manner and to proper parties only." *Id.* "Whether an occasion gives rise to a qualified or conditional privilege is generally a question of law for the court." *Id.*

Respondent Williams is the Director for the SCBOA District One. In this capacity, he is responsible for enforcing professional standards and making sure that officials abide by the rules of the SCBOA. (*See* R. p. 771, SCBOA District 1 Contract, which states in relevant part: "*I understand that the District 1 director has the authority to enforce professional standards and to accept or reject my transfer to another district or readmittance to the SCBOA.*"). Williams not only had the right, but the obligation, to ask Appellant about her attire at the basketball game. Appellant, obviously outraged by Williams' inquiry about her uniform, initiated the discourse, and displayed her own lack of professionalism, when she sent a text message to Williams complaining about his "harassment" and "monopoly status." Williams' email was in direct response to her text.

Considering Appellant's remarks, it was entirely appropriate and a "proper occasion" for Williams to include the District One Board members, and Skip Lax on such response. The Board members and Skip Lax were all proper parties to the communication because it involved potential disciplinary action to be taken by them against Appellant as a District One official. Therefore, they had an interest in the subject matter of the email. Although Williams had the authority, as the District One Director, to take disciplinary action, out of fairness to Appellant, he chose to recuse himself and leave the matter to the Board members. (Supp. R. p. 116, Williams

Aff., ¶ 31). He wanted them to have a complete summary of his previous communications with Appellant. (Supp. R. p. 115, Williams Aff., ¶ 28).

Furthermore, the record demonstrates that Williams' statements were made in good faith and without malice. "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. To prove actual malice, Appellant must show that Williams was activated by ill will in what he did, with the design to causelessly and wantonly injure her, or that the statements were published with such recklessness as to show a conscious disregard for Appellant's rights. Although abuse of the conditional privilege is generally an issue for the jury to decide, in the absence of a controversy as to the facts, it is for the court to determine. Similarly, if the Appellant fails to present evidence of a genuine issue of fact as to actual malice and the qualified privilege is otherwise applicable, summary judgment may be granted." *Tietex,* 790 S.E.2d at 415-16 *(internal citations omitted).* Evidence of Respondent Williams' good faith is demonstrated at the very least by his decision to recuse himself and his invitation to Appellant to attend the Board meeting at which the issue of disciplinary action would be reviewed. (Supp. R. pp. 116-117, Williams Aff., ¶¶ 31, 32, and 35). Furthermore, there is no evidence that the email was sent to anyone other than the Board members or Skip Lax.

Once again, Appellant has not come forward with any evidence to show that Williams exceeded the privilege or acted with any malice toward her. Because Appellant had accused Williams of "harassing" her and because of her stated intention to report to the SCHSL about Williams' alleged "monopoly status," Williams felt that it was necessary to provide the Board and Mr. Lax with a complete summary of the prior communications between them. (Supp. R. p.

115, Williams Aff., ¶ 28). In Williams' experience as a District One Board member, the Board would typically become involved in disciplinary issues. (Supp. R. p. 116, Williams Aff., ¶ 31). Furthermore, Skip Lax was the Commissioner of Officials, who had a similar interest in official disciplinary action. Further, the communication did not contain any negative adjectives or characterization of Appellant, but was entirely factual in nature. Notably, Williams concluded by offering to assist her with a transfer to another district, if that was her preference. Clearly, Williams' email was made in a proper manner to proper parties only, and therefore, is subject to a qualified privilege.

B. The Circuit Court Did Not Abuse its Discretion in Denying Appellant's Motion to Compel.

Appellant's complaint that the trial judge denied her fairness and an opportunity to be heard at the March 20, 2017 hearing is without merit. The hearing transcript demonstrates that the court gave Appellant ample opportunity to state the basis for her motion to compel. Respondents demonstrated that they had produced all relevant information that had been requested by Appellant in discovery. To the extent he was able to do so, Respondent Williams fully answered Appellant's discovery requests. However, Respondent Williams also objected, when appropriate, to Appellant's requests for information that were not relevant and beyond the scope of reasonable and appropriate discovery for this case, such as Respondent's tax returns. (*See* R. pp. 70-83, R. pp. 464-470, 2nd Supp. R. pp. 4-7, Respondent Williams' responses to Plaintiff's Interrogatories and Requests for Production.) Appellant failed to demonstrate what information she was seeking through discovery, which had not already been produced, and which was necessary to shed further light on the facts set forth in the motions, exhibits and affidavits properly submitted by the Respondents. Appellant has failed to make a "clear showing" of any abuse of discretion by the court below. *Bayle v. South Carolina Dep't of*

Transportation, 344 S.C. 115, 128-29, 542 S.E.2d 736, 742-43 (Ct. App. 2001) (noting it was proper for the trial court to quash motion for additional discovery and to grant summary judgment to the other party, where record "does not demonstrate further discovery would have contributed to the resolution of the issue at hand.").

C. Appellant's Claimed Issues of Unfair Termination, Discovery Abuse, Perjury, and Damages Were Not Preserved for Appellate Review.

Appellant raises a number of additional issues that were not raised below and were not ruled upon by the circuit court. "It is axiomatic that an issue cannot be raised for the first time on appeal, but must have been raised to and ruled upon by the trial judge to be preserved for appellate review." *Wilder Corp. v. Wilke*, 330 S.C. 71, 76, 497 S.E.2d 731, 733 (1998). Many of the issues raised by Appellant are not appropriate for review by this Court.

For example, Appellant now seeks to have this Court decide whether her position as a District One basketball official was properly terminated. (*See Appellant's Brief,* ¶¶ 7, 8, 10, 11, 14, 21 and 23 (pp. 5-7, 9). She has also asked this Court to decide her claimed damages (*Appellant's Brief,* ¶¶ 25, 26, 32, 33, and 34, pp. 10-12), her claims of alleged discovery abuse (*Appellant's Brief,* ¶¶ 28-29, pp. 10-11) and her claims of perjury (*Appellant's Brief,* ¶¶ 30 and 31, p. 11) by the Respondents. None of these issues were ruled upon by the court below, and therefore, have not been preserved for review.

CONCLUSION

For the reasons set forth above, Respondent E.A. "Rico" Williams requests that the April 19, 2017 Order below be affirmed.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

November 29, 2018

Sarah Day Hurley (SC Bar No. 16241)
shurley@turnerpadget.com
P.O. Box 1509
Greenville, South Carolina 29602
Telephone: (864) 552-4651
Attorney for Respondent E.A. "Rico" Williams

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2017-001147
Civil Action No. 2016-CP-23-02113

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.

CERTIFICATE OF COUNSEL

The undersigned hereby certifies that the Final Brief of Respondent E.A. "Rico" Williams complies with Rule 211(b), SCACR, as well as the South Carolina Supreme Court's Order dated April 15, 2014.

November 29, 2018 By: _____

Sarah Day Hurley (SC Bar No. 76241)
Turner, Padget, Graham & Laney, P.A.
Post Office Box 1509
Greenville, SC 29502
Phone: (864) 552-4651
SHurley@TurnerPadget.com
ATTORNEYS FOR RESPONDENT
E.A. "RICO" WILLIAMS