

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Doyet A. Early, Circuit Court Judge

Appellate Case No. 2019-000648
Civil Action No. 2018-CP-40-02425

RECEIVED
OCT 09 2019
SC Court of Appeals

Jefferson Davis, Jr. Appellant,

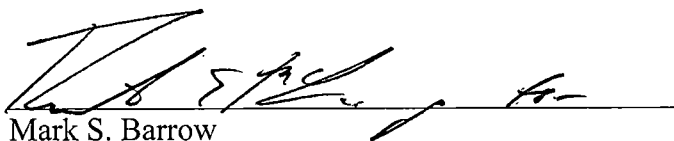
v.

Ellen Weaver, Chad Connelly, Oran P. Smith, Neil J. Mellen, Howard S. Rich, Rick Reams, Stephen D. Kirkland, Palmetto Promise Institute, Palmetto Family Council, Palmetto Family Action, South Carolinians for Responsible Government, SCRG Foundation, Access Opportunity South Carolina, Friedman Foundation for Educational Choice, Inc., Cato Institute, South Carolina Educational Credit for Exceptional Needs Children Fund, South Carolina Education Oversight Committee, South Carolina Dept. of Revenue, South Carolina Dept. of Labor, Licensing and Regulation, First Impressions, Inc. d/b/a/ Richard Quinn & Associates, First Tuesday Strategies, LLC, Bill Wilson, Jason Bedrick, Jim DeMint, Randy Page, Tony Denny, Phillip Cease, Melanie Barton, Doris Cubitt, Susan Thomas, John McCormick, Nate Leupp, Institute of Management Consultants USA & John Doe(s) 1-40 Respondents.

**RESPONDENTS PALMETTO FAMILY COUNCIL AND PALMETTO FAMILY ALLIANCE'S
DESIGNATION OF MATTER FOR THE RECORD ON APPEAL**

In the interests of economy and efficiency, and pursuant to Rule 209, SCACR, Respondents Palmetto Family Council and Palmetto Family Alliance adopt and incorporate by reference the Designation of Matter filed by co-Respondents Cato Institute and Howard S. Rich, which undersigned counsel certifies pursuant to Rule 209(c), SCACR contains no matter irrelevant to the appeal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Barrow", is written over a horizontal line.

Mark S. Barrow
Martin S. Driggers, Jr.
Sweeny, Wingate & Barrow, P.A.
Post Office Box 12129
Columbia, SC 29211
(803) 256-2233
Attorneys for Defendants Palmetto Family Council
and Palmetto Family Alliance

Hartsville, South Carolina
October 9, 2019

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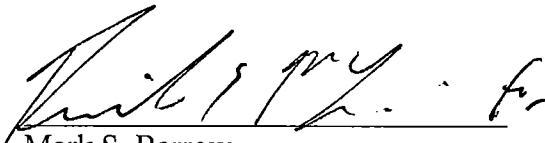
Respondents.

Consultants USA & John Doe(s) 1-40

PROOF OF SERVICE

I certify that I have served a copy of Respondents Palmetto Family Council and Palmetto Family Action’s Designation of Matter for the Record on Appeal, on Appellant, Jefferson Davis, Jr., by depositing a copy of the same in the United States Mail, Postage Prepaid, on October 9, 2019, addressed to Jefferson Davis, Jr., 403 McCarter Avenue, Greenville, South Carolina 29615.

October 9, 2019



Mark S. Barrow

Martin S. Driggers, Jr.

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Columbia, SC 29211

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Attorneys for Respondents Palmetto Family
Council and Palmetto Family Action

S·W·B

SWEENEY WINGATE & BARROW P.A.

October 9, 2019

Reply to: Pee Dee Office

Martin S. Driggers, Jr.
(843) 878-0390 x7181
msd@swblaw.com

VIA HAND DELIVERY

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

RECEIVED
OCT 09 2019
SC Court of Appeals

RE: Jefferson Davis, Jr. v. Palmetto Family Council, et al.
Civil Action No.: 2018CP4002425/2019-000648
Our File: 4513-11974

Dear Ms. Kitchings:

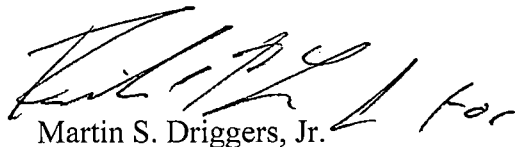
Enclosed please find the original and one (1) copy of Respondents Palmetto Family Council and Palmetto Family Alliance's Designation of Matter for the Record on Appeal, along with a Proof of Service in connection with the above-referenced matter. Please file the originals and return the remaining clocked copies to our courier.

By copy of this letter to counsel of record, I am serving them with same.

Thank you for your assistance, and should you have any questions, please do not hesitate to contact me.

Yours truly,

SWEENEY, WINGATE & BARROW, P.A.


Martin S. Driggers, Jr.

MSD/smt
Enclosures
CC: Counsel of Record via electronic mail