

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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SC 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

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.

**RESPONDENT TONY DENNY'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD  
ON APPEAL**

In the interests of judicial economy and efficiency, and pursuant to Rule 209, SCACR, Respondent Tony Denny adopts and incorporates by reference the Designation of Matter 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.

**[SIGNATURE ON FOLLOWING PAGE]**

Respectfully submitted,

Turner Padgett Graham & Laney, P.A.



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Greenville, South Carolina  
November 8, 2019

ATTORNEY FOR RESPONDENT  
TONY DENNY

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Respondents.

**PROOF OF SERVICE**

I certify that I have served the **Initial Brief of Respondent Tony Denny and Designation of Matter to be included in the Record on Appeal** upon the following parties via electronic mail to the addresses listed below:

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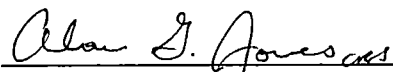
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November 8, 2019

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TONY DENNY

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November 8, 2019

**VIA HAND-DELIVERY**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
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SC Court of Appeals

Re: Davis v Denny  
Docket No.: 2018-CP-40-02425  
Claim No: 039046677  
TP File No.: 01464.07984

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Initial Brief of Respondent Tony Denny, Designation of Matter to be Included in the Record on Appeal, and a Proof of Service on all parties for the same. Please return a clocked copy to me in the enclosed self-addressed stamped envelope.

Should you have any questions or concerns, please do not hesitate to contact me.

With kind regards,

Sincerely,

TURNER PADGET GRAHAM & LANEY, P.A.



Alan G. Jones

AGJ/klb  
Enclosures