

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
L. Casey Manning, Circuit Court Judge

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Appellate Case No. 2019-001603  
Case No. 2019-CP-40-01615

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**RECEIVED**  
JAN 27 2020  
SC Court of Appeals

T.D., by and through his guardians, A.D. and J.D.,

Appellants,

v.

Richland County School District Two,

Respondent.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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D. Michael Mathison  
Richland County Public Defender's  
Office  
1701 Main St., Suite 103  
Post Office Box 192  
Columbia, South Carolina 29202  
Ph: (803) 766-5170  
Fax: (803) 766-5180  
Mathison.Michael@richlandcountysc.gov  
Attorney for Appellants

Appellants propose the following be included in the Record on Appeal:

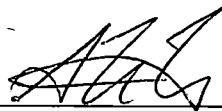
1. Order of the Honorable L. Casey Manning dated August 16, 2019.
2. Decision Letter of Richland County School District Board of Trustees, dated February 18, 2019
2. Notice of Appeal Summons and Complaint, dated March 20, 2019
3. Designation of Matter to be Included in the Record on Appeal, dated March 20, 2019.

4. Answer and Return dated April 18, 2019.
5. Certification of Record dated April 18, 2019.
6. Motion to Enlarge Time to Certify and File Record, dated April 26.
7. Amended Certification of Record dated May 1, 2019.
8. Respondent/Defendant's Designation of Additional Matter for Record dated May 2, 2019.
9. Defendant's Memorandum in Opposition dated July 18, 2019.
10. Plaintiffs' Supplemental Reply Brief dated July 25, 2019.
11. Transcript of Hearing on July 26, 2019.
12. Disc containing Audio Files of Hearings on December 12, 2018 and February 12, 2018, filed by Appellants on June 5, 2019.
13. A.R. Exhibit 34; Hearing Audio 1
14. A.R. Exhibit 35; Hearing Audio 2
15. Def's Add'l Rec. Exhibit 19
16. Plaintiffs' Exhibit 2
17. Incident Report dated December 1, 2018. A.R. Exhibit 15.
18. Statement of Student T.D. dated December 2, 2018. A.R. Exhibit 14
19. Emailed statement of Student C.G. dated December 2, 2018. A.R. Exhibit 19.
20. Undated Investigative Follow Up. A.R. Exhibit 17
21. Plaintiffs' Exhibit 1.
22. Pictures of Phones showing images. Plaintiff's Exhibit 3.
23. Pictures of Phones showing images. A.R. Exhibit 18.
23. Text and Email Correspondence between K. Mazyck and Sgt. R.C. Truluck dated December 4, 2018. A.R. Exhibit 16.
24. Disciplinary Referral dated December 4, 2018.
25. BMS Incident Statement from Student K.M. dated December 5, 2018. A.R. Exhibit 10.
26. BMS Incident Statement from Student H.C. dated December 5, 2018. A.R. Exhibit 11.
27. BMS Incident Statement from Student C.G. dated December 5, 2018. A.R. Exhibit 12.
28. Letter of Lottie S. Chishom to A.D. and J.D. dated December 5, 2018.
29. Letter of K. Mazyck to A.D. and J.D. dated December 5, 2018. A.R. Exhibit 9.
30. Statement of T.D. dated November 27, 2018. A.R. Exhibit 13.

32. Letter of A.D. dated January 6, 2019, appealing expulsion decision.
31. Letter dated January 8, 2019, from Dep. C.J. Smith to K. Mazyck. A.R. Exhibit 21.
32. Letter dated January 11, 2019, from L. Chishom Hearing Officer to A.D. regarding decision. A.R. Exhibit 22.
33. Summary of Evidence from December 12, 2018 hearing. A.R. Exhibit 24.
34. Original Transcribed Meeting Minutes from Hearing on December 12, 2018. A.R. Exhibit 25.
32. Email Communications between D.M. Mathison and J.R. Drain dated January 10-14, 2019. Def's. Add'l Rec. Exhibit 3.
33. BoardDocs Student Appeals report to Board last updated on February 1, 2019. A.R. Exhibit 32.
33. Supplemental Appeal and Case Law submitted February 5, 2019. A.R. Exhibit 26.
33. Email Communications between D.M. Mathison and J.R. Drain dated February 5-6, 2019. Def's Add'l Rec. Exhibit 11.
34. Email from J. Drain to D.M. Mathison dated February 8, 2019. A.R. Exhibit 28.
35. Revised Transcribed Meeting Minutes prepared by Halligan Mahoney & Williams. A.R. Exhibit 27.
36. Letter from D.M. Mathison to J.R. Drain regarding board appeal procedures and transcripts dated February 8, 2019.
37. Letter from V. Williams re hearing dated February 12, 2019.
38. Email correspondence between V. Williams and D.M. Mathison re hearing procedures. Def's Add'l. Rec. Exhibit 12.
39. Appellants List of Records for Inclusion in Board Record. A.R. Exhibit 31.
40. Letter of D.M. Mathison to Clerk of Court dated June 5, 2019.

I certify that this designation contains no matter which is irrelevant to this appeal.

January 20, 2020.




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THE STATE OF SOUTH CAROLINA  
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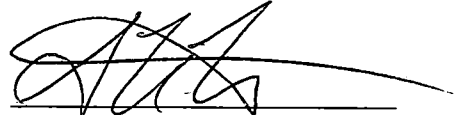
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District Two,

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PROOF OF SERVICE

I certify that I have served the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal on Richland County School District Two, on January 27, 2020, by personally delivering a copy of same to its attorneys of record, Jasmine R. Drain and Vernie L. Williams, of Halligan, Mahoney & Williams, 1301 Gervais Street, Suite 1400, Columbia, South Carolina.



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Attorney for Appellants

January 27, 2020

**RICHLAND COUNTY PUBLIC DEFENDER  
YOUTH REENTRY PROGRAM**

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January 27, 2020  
HAND DELIVERY

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211  
Fax: (803) 734-1839

**RECEIVED**  
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Re: T.D, by and through his guardians, A.D. and J.D., v. Richland County School  
District Two  
Appellate Case No. 2019-001603

Dear Ms. Kitchings:

Enclosed for filing please find the originals and a copies of the Initial Brief of Appellants and Designation of Matter to Be Included in the Record on Appeal, together with the original Proof of Service. If anything further is needed, don't hesitate to contact me.

Sincerely,



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Vernie L. Williams, Esq.  
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Attorneys for the Respondent