

THE STATE OF SOUTH CAROLINA  
in the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable D. Craig Brown

Case No.: 2019-CP-10-0113

**RECEIVED**  
MAR 06 2020  
SC Court of Appeals

Dana Mazyck, Guardian Ad Litem for Tyler M., a Minor Child under the age of 14.....Appellant

Charleston County School District .....Respondent.

RESPONDENT'S DESIGNATION OF MATTERS  
TO BE INCLUDED IN THE RECORD ON APPEAL

Lisa A. Reynolds  
SC Bar # 15527  
W. Coleman Lawrimore  
S.C. Bar # 101180  
Anderson Reynolds & Stephens, LLC  
37 ½ Broad Street  
P.O. Box 87  
Charleston, SC 29401  
(843) 723-0185 –phone  
*Attorneys for Respondents*

March 5, 2020

Respondent proposes the following be included in the Record on Appeal:

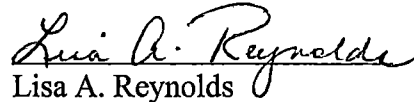
1. Summons and Complaint filed April 21, 2017 in 2017-CP-10-1970;
2. Charleston County School District's Answer and Motions to Dismiss filed May 23, 2017 in 2017-CP-10-1970;
3. Appellant's Memorandum in Opposition to Defendant's Motion to Dismiss filed April 18, 2018 in 2017-CP-10-1970;
4. Charleston County School District's Memorandum in Support of Motion to Dismiss filed April 13, 2018 in 2017-CP-10-1970;
5. The Honorable Roger M. Young, Sr.'s Order Granting Charleston County Schools District's Motion to Dismiss dated June 1, 2019 in 2017-CP-10-1970;
6. Summons and Complaint filed January 9, 2019 in 2019-CP-10-0113;
7. Charleston County School District's Answer and Motions to Dismiss filed February 8, 2019 in 2019-CP-10-0113;
8. Appellant's Memorandum in Opposition to Defendant's Motion to Dismiss filed June 11, 2019 in 2019-CP-10-0113;
9. Respondent's Reply to Appellant's Memorandum in Opposition to Defendant's Motion to Dismiss filed June 13, 2019 in 2019-CP-10-0113;
10. The Honorable D. Craig Brown's Form 4 Order Granting Defendant's Motion to Dismiss filed June 19, 2019 in 2019-CP-10-0113;
11. The Honorable D. Craig Brown's Order Charleston County School District's Motion to Dismiss with Prejudice filed July 3, 2019 in 2019-CP-10-0113;
12. Transcript of Hearing on Charleston County School District's Motion to Dismiss taking place on June 14, 2019 in 2019-CP-10-0113; and

13. Appellant's Notice of Appeal.

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

Respectfully submitted:

ANDERSON REYNOLDS &  
STEPHENS, LLC



Lisa A. Reynolds  
W. Coleman Lawrimore  
37 ½ Broad Street  
P.O. Box 87  
Charleston, SC 29401  
(843) 723-0185 –phone  
(843) 405-0313 –fax  
ATTORNEYS FOR RESPONDENT

March 5, 2020  
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA  
in the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable D. Craig Brown

Case No.: 2019-CP-10-0113

**RECEIVED**  
MAR 06 2020  
SC Court of Appeals

Dana Mazyck, Guardian Ad Litem for Tyler M., a Minor Child under the age of  
Fourteen (14).....Appellant,

v.

Charleston County School District .....Respondent.

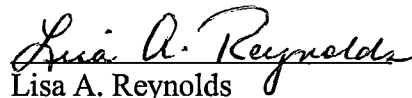
PROOF OF SERVICE

The undersigned certifies that a copy of the *Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal* has been served upon counsel for Appellant by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below, this 5 day of March, 2020.

Kathleen Chewing Barnes  
Barnes Law Firm, LLC  
P.O. Box 897  
Hampton, SC 29924

Tiffany R. Spann-Wilder  
P.O. Box 70488  
North Charleston, SC 29415

ANDERSON REYNOLDS & STEPHENS,  
LLC

  
Lisa A. Reynolds

W. Coleman Lawrimore  
37 1/2 Broad Street  
P.O. Box 87  
Charleston, SC 29401  
(843) 723-0185 –phone  
(843) 405-0313 –fax

ATTORNEYS FOR RESPONDENT

March 5, 2020  
Charleston, South Carolina

**ANDERSON REYNOLDS & STEPHENS, LLC**

ATTORNEYS AT LAW  
37 ½ BROAD STREET  
POST OFFICE BOX 87  
CHARLESTON, SOUTH CAROLINA 29402

JONATHAN J. ANDERSON  
LISA A. REYNOLDS  
SHANNA M. STEPHENS  
W. COLEMAN LAWRIKORE  
JONATHAN L. ANDERSON

TEL. 843-723-0185  
FAX. 843-405-0313  
email: [lreynolds@arslawsc.com](mailto:lreynolds@arslawsc.com)

March 5, 2020

**RECEIVED**

MAR 06 2020

SC Court of Appeals

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

Re: Dana Mazyck, Guardian Ad Litem for Tyler M., a Minor Child under the age of 14, vs.  
Charleston County School District  
Case #: 2019-CP-10-0113  
Appellate Case #: 2019-001235  
Claim #: GL020756  
AR & S #: 20180.64

Ms. Kitchings:

Enclosed please find the original and two (2) copies of the Respondent's Initial Brief, Proof of Service, and Designation of Matter to be Included in the Record on Appeal in the above referenced matter. If you would, please return a filed copies in the self-addressed postage paid envelope enclosed. By copy of this correspondence, I have provided same to counsel for the Appellants.

Please do not hesitate to contact me should you have any questions or if I may be of additional assistance. (843-723-0185).

Sincerely yours,



Kathryn L. Lawrimore

/kl  
Enclosures

Cc: Kathleen C. Barnes, Esq. (via electronic correspondence only)  
Tiffany R. Spann-Wilder, Esq. (via electronic correspondence only)

Pull To Open

EXTREM



1007



29211

U.S. POSTAGE PAID  
RTE 1, CHARLSTON, SC  
29403  
MAR 05 2020  
AMOUNT  
**\$0.00**  
R2305M148519-09

UNITED STATES POSTAGE  
02 1P  
0001981436 MAR 05 2020  
MAILED FROM ZIP CODE 29401  
PINEY BOWES  
\$ 026.75<sup>00</sup>



Flat rate  
Mailing Envelope  
For Domestic and International Use

Visit us at usps.com



When used internationally  
affix customs declarations  
(PS Form 2976, or 2976A).



EL667628556US

WRITE FIRMLY WITH BALL POINT PEN ON HARD SURFACE TO MAKE ALL COPIES LEGIBLE.

**CUSTOMER USE ONLY**

FROM: (PLEASE PRINT) PHONE: 415-725-2155  
 LITTON, ARNOLD, PHOENIX, BOWEN & STANLIS  
 P.O. BOX 67  
 CHARLSTON, SC 29403

**PAYMENT BY ACCOUNT** (If applicable)  **POSTAGE** (If applicable)

**DELIVERY OPTIONS** (Customer/Post Only)

**SIGNATURE REQUIRED** Note: The meter must check the "Signature Required" box on all flats. Requires the addressee's signature. OR  **Postnet** (Additional fee, where available). OR  **Postnet** (Additional fee, where available). OR  **Postnet** (Additional fee, where available). OR  **Postnet** (Additional fee, where available).

**No Saturday Delivery** (Standard next business day)  
 **Sunday/Holiday Delivery** (Additional fee, where available)  
 **10:30 AM Delivery** (Additional fee, where available)  
 **12:00 PM Delivery** (Additional fee, where available)

**TO:** (PLEASE PRINT) PHONE: 415-725-2155  
 CLERK OF COURT SEC. COURT OF APPEALS  
 JIMMY A. KITCHENS  
 P.O. BOX 11629  
 COLUMBIA SC 29211

2nd CLASS ADDRESSES ONLY

**ORIGIN (POSTAL SERVICE USE ONLY)**

1 Day  2 Day  Priority Mail  EMS

**POST OFFICE** 215403 **Scheduled Delivery Date** 3/16/20 **Postage** \$ 26.35

**Date Accepted (MM/DD/YYYY)** 3/16/20 **Schedule Delivery Time**  10:30 AM  3:00 PM  12:00 PM **Insurance Fee** \$ **COD Fee** \$

**Time Accepted** 11:00 AM  AM  PM **10:30 AM Delivery Fee** \$ **Return Receipt Fee** \$ **Low Annual Transportation Fee** \$

**Special Handling Fees** **Saturday/Holiday Premium Fee** **Total Postage & Fees** \$ 26.35

**Weight**  Flat Rate  Flat Rate **Acceptance Employee Initials** **Employee Signature** [Signature]

**DELIVERY (POSTAL SERVICE USE ONLY)**

**Delivery Attempt (MM/DD/YYYY)** 3/16/20 **Time** 11:00 AM **Employee Signature** [Signature]

**DELIVERY (CUSTOMER USE ONLY)**

**Delivery Attempt (MM/DD/YYYY)** 3/16/20 **Time** 11:00 AM **Employee Signature** [Signature]

3-ADDRESSEE COPY

082798 ENL 05/19/18 OCT 2008

USPS packaging products have been awarded Credits to Create Certificates for their ecologically intelligent designs. For more information go to [mdu.com/usps](http://mdu.com/usps)

Please recycle.



EP13F

This packaging is the property of the U.S. Postal Service and is provided solely for use in sending Express Mail shipments.