

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

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

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Jefferson Davis, Jr. .... Appellant,

v.

Ellen Weaver, Chad Connelly, Oran P. Smith, Neil J. Mellen, Howard S. Rich, Rick Reames, 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 .....

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MAR 20 2020  
SC Court of Appeals

Respondents.

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**RESPONDENT FIRST TUESDAY STRATEGIES, LLC'S RETURN TO  
APPELLANT'S MOTION TO STRIKE**

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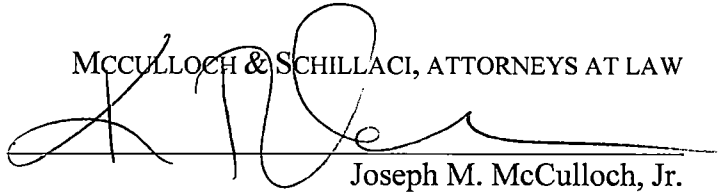
To the extent Appellant's Motion to Strike is directed at Respondent First Tuesday Strategies, LLC, Respondent opposes Appellant's Motion to Strike. Specifically, in the interest of judicial economy and efficiency, this Respondent joins in the applicable arguments set forth by other respondents in this matter including but not

limited to the response in opposition filed by Respondent Cato Institute. Additionally, this Respondent asserts that its initial brief addressed the arguments set forth in the Appellant's initial brief and raised additional sustaining grounds found in the record below. Per Rule 208, SCACR, "Respondent's brief may also contain argument asking the court to affirm for any ground appearing on the record as provided by Rule 220(c)." Per Rule 220(c), SCACR, "The appellate court may affirm any ruling, order, decision or judgment upon any ground(s) appearing in the Record on Appeal." Id.

To the extent Appellant's argument concerning the Record on Appeal is addressed to this Respondent, it has designated only those matters deemed relevant to the issues on appeal.

For these reasons, Appellant's Motion to Strike should be denied.

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Attorneys for Respondent, First Tuesday Strategies, LLC

March 19, 2020

Columbia, South Carolina

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v.

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Rick Reames, 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.....

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**PROOF OF SERVICE**

I certify that on behalf of First Tuesday Strategies, LLC, I have served all counsel in this  
action with a copy of Respondent First Tuesday Strategies, LLC's Return to Appellant's Motion to  
Strike by first-class United States Mail, postage prepaid addressed to:

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Served this 17th day of March, 2020.

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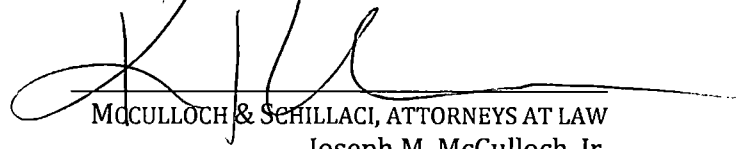
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March 18, 2020

The Honorable Jenny A. Kitchings, Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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**RE: Davis v. Weaver**  
**Civil Action No.: 2018-CP-40-02425**  
**Appellate Case No.: 2019-000648**

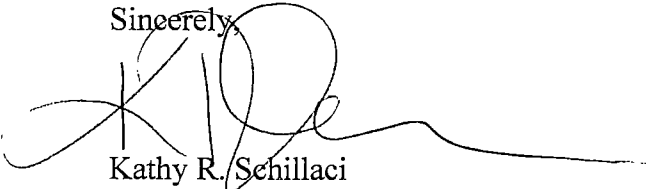
MAR 20 2020  
SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed for filing an original and six (6) copies of Respondent First Tuesday Strategies, LLC's Return to Appellant's Motion to Strike. Please also find enclosed Proof of Service. If you would, please clock the additional copies and return in the self-enclosed stamped envelope.

We appreciate your attention to this matter. Should you have any questions, please do not hesitate to contact us.

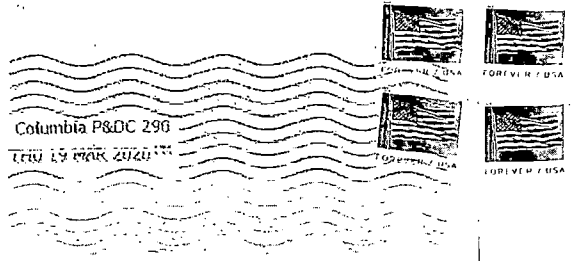
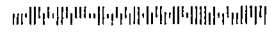
Sincerely,



Kathy R. Schillaci

Enclosure(s)

cc: Counsel of Record



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