

SUPPLEMENTAL RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
[In The Supreme Court]

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Case No. 2016-CP-23-02113
Appellate Case No. 2017-001147

Aminah A. Richburg

Appellant

v.

E.A. Rico Williams, Director District One
S.C. Basketball Officials Association and
The South Carolina High School League

Respondents,

SUPPLEMENTAL RECORD ON APPEAL

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Certificate of Counsel / Appellate Pro Se

The undersigned hereby certifies that the Supplemental Record on Appeal as well as References on Record on Appeal communicated in the Supplemental Record on Appeal contains all material proposed to be included according to the Order filed July 17, 2018, After careful consideration, Respondents' motion is granted. Within twenty days of the date of this order, Appellant shall serve and file a supplemental record on appeal that included all matters designated by Respondent.



August 6, 2018

Aminah A. Richburg Pro Se

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(SCHSL)(Williams) Complete Transcript of Circuit Courts Hearing on
Defendant's Motion for Summary Judgment and Plaintiff's Motion to Compel dated March 20,
2017

STATE OF SOUTH CAROLINA)

COUNTY OF GREENVILLE)

COURT OF COMMON PLEAS
2016-CP-23-02113

AMINIAH A. RICHBURG,
PLAINTIFF,)

vs.)

TRANSCRIPT OF RECORD

E.A. "RICO " WI LLIAMS ,)
DIRECTOR, DISTRICT ONE S.C.)
BASKETBALL OFFICIALS)
ASSOCIATION, AND THE SOUTH)
CAROLINA HIGH SCHOOL LEAGUE,)

ORIGINAL

DEFENDANTS. —)

March 20, 2017
Greenville, South Carolina

BEFORE :

THE HONORABLE PERRY H. GRAVELY, JUDGE.

APPEARANCES :

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Pro Se

SARAH D. HURLEY, ESQ.
Attorney for Defendant E.A. "Rico" Williams

JOHN M. MONTGOMERY, ESQ.
Attorney for Defendant South Carolina High School League

HOLLIE M. JENKINS
Circuit Court Reporter

I N D E X

(There were no witnesses called.)

E X H I B I T S

(There were no exhibits introduced.)

P R O C E E D I N G S

THE COURT: All right. This is the case of --

Is it Aminah? Did I pronounce it right?

MS. RICHBURG: Yes, sir.

THE COURT: Aminah Richburg v. E.A. "Rico" Williams,
et al.

And there's -- I believe there's three motions. Am I correct?

MS. HURLEY: I believe that's right, Your Honor.

THE COURT: Two motions for -- a motion to compel discovery by the Plaintiff, and then a motion for summary judgments on behalf of --

Does that cover all Defendants?

MR. MONTGOMERY: Yes, Your Honor.

THE COURT: All right.

MR. MONTGOMERY: My name is Michael Montgomery. I represent the South Carolina High School League.

THE COURT: Okay.

MR. MONTGOMERY: We're a separate Defendant from Mr. Williams as director of the --

THE COURT: Right.

All right. Well, I guess, Ms. Richburg, let me hear -- let's hear the motions for summary judgment first. And then we'll hear the motion to well, no, you filed your first. I'm going to let you

1 It looks like hers was filed first; is that correct?

2 MS. RICHBURG: Yes, sir.

3 THE COURT: All right. Let me hear from her first
4 then.

5 All right. I'll be glad to hear from you.

6 MS. RICHBURG: Okay. Your Honor, I, Aminah Richburg,
7 the Plaintiff, have asked for compensation with the first
8 and second interrogatories to be used as tools to obtain
9 facts due to limitations with knowledge and memory --

10 THE COURT: I guess what -- you tell me what you've
11 asked for that they haven't provided to you.

12 MS. RICHBURG: Okay.

13 THE COURT: Let's just kind of cut to the chase.

14 MS. RICHBURG: Okay. I can do that, Your Honor.

15 With the first set of interrogatories, there were, in
16 all, 18 factual information requests that were made. Out
17 of the factual requests made in the first interrogatories,
18 the Defendants have failed to provide the factual
19 information for interrogatory 1, 5 -- 1, 4, 5, 6, 7, 8, 9,
20 10, 12, 13, 16, and 18.

21 When I submitted my motion, I gave detailed
22 information all descriptive information pertaining to why
23 I'm asking for the information and the information that
24 the Defendants provided.

25 In the second interrogatories, the interrogatories

1 for the second one is for interrogatory 2, 3, 4, 5, 6, 7,
2 8, 11, 13, 14, and 15. The only -- the responses came
3 from Mr. Montgomery that represents the South Carolina
4 High School League. Ms. Hurley, who represents E.A.
5 "Rico" Williams, has failed to send any type of responses
6 for the second interrogatories.

7 So I've only received answers for the first set of
8 interrogatories from the Defendants. And when I
9 communicated in the first interrogatories information I
10 didn't receive, that's from both of the Defendants.

11 And then in the second set of interrogatories, I
12 received factual information only from Michael Montgomery.
13 I did not receive any information from Ms. Hurley since I
14 filed for the second interrogatories.

15 THE COURT: All right. And is this your motion to
16 compel that was filed on October the 11th?

17 MS. RICHBURG: Yes. That's when it started.

18 THE COURT: All right. And that's -- you know,
19 that's where it covers all your -- and you've got very
20 good detail of all the issues there.

21 MS. HURLEY: Your Honor, if I may clarify.

22 THE COURT: Well -- all right.

23 MS. HURLEY: I'm sorry.

24 THE COURT: Go ahead.

25 MS. HURLEY: I think she filed something subsequent

1 to what was filed in October that is -- I believe --

2 MR. MONTGOMERY: January.

3 MS. HURLEY: She filed something in January that's
4 the subject of today's motion hearing.

5 THE COURT: Okay.

6 MS. RICHBURG: The first motion was filed in October.
7 That was with the first set of interrogatories.

8 THE COURT: All right. And that has been addressed?

9 MS. RICHBURG: It was not addressed. That's why --

10 THE COURT: I guess -- has there been a hearing on
11 this?

12 MS. RICHBURG: Well, the hearing took place. The
13 Defendants presented a protection order.

14 And so the Judge -- she did not -- she was not
15 prepared. She didn't even have a copy of the protection
16 order. And what she communicated to us was that she was
17 going to look over the information for the protective
18 order. And she just advised counsel to communicate with
19 me to see what interrogatory information that I was asking
20 for. But

21 THE COURT: All right.

22 MS. RICHBURG: -- nothing was ever discussed.

23 THE COURT: Let me -- because you filed something in
24 January. I'm -- what is it called? Is it something a
25 little different?

1 MS. RICHBURG: It says -- the one that I filed in
2 January is -- it's second motion -- second notice of
3 motion to compel first and second interrogatories request
4 for a hearing. That was filed in January. That was on
5 the 13th of January.

6 THE COURT: Okay. For some reason, the binder did
7 not get that out. It says, Document error.

8 MS. RICHBURG: Yes. And, Your Honor --

9 THE COURT: So I do not have a copy of that before
10 me.

11 MS. RICHBURG: You do not.

12 And, Your Honor, I'm going to just bring to your
13 attention that I have filed maybe about

14 THE COURT: Hold on. Let me get this. Let me get
15 this.

16 MS. RICHBURG: Okay.

17 THE COURT: Does anybody have a copy of this? Do
18 y'all have a copy that y'all can --

19 MR. MONTGOMERY: Your Honor, I have a copy that I
20 have not marked on.

21 THE COURT: All right.

22 MS. RICHBURG: Could I make sure that that is the
23 copy that I have for today?

24 THE COURT: Yes.

25 (Pause.)

1 MS. RICHBURG: That's not the same. Because it would
2 have -- you don't have the first and second
3 interrogatories. This is not the one I have.

4 If someone could make a copy of mine, Your Honor.
5 That's the one that --

6 THE COURT: Well, hold on. I think I can find it
7 another way. I may be able to pull it up.

8 MS. RICHBURG: Okay. Thank you.

9 (Pause.)

10 THE COURT: All right. Now, I'm on the same page, 1
11 of 94, I see.

12 MS. RICHBURG: Yes. I'm sorry.

13 THE COURT: Okay. So we're here for the second --
14 okay. And the only -- and the computer file that I had
15 had your first motion. And that was what I was looking
16 at. But we're here for your second motion. Okay. And
17 you very, specifically, have laid out all of the
18 questions.

19 All right. Anything else you would like to tell me
20 about that?

21 MS. RICHBURG: Well, with the motion to --

22 THE COURT: Yes.

23 MS. RICHBURG: Sir, the reason why, you know, I'm
24 asking for this compensation with this information so it
25 can be used to reveal the truth and produce justice and

1 correctness with every question that I have with the
2 interrogatories.

3 Everything really conspired with an e-mail that was
4 sent by the Defendant, Eco -- I mean Rico Williams. He
5 initiated everything. Nothing was initiated by Aminah
6 Richburg, who is standing before you as the Plaintiff.
7 His insidious behavior resulted in a difference of --

8 THE COURT: Well, I'm just talking about discovery
9 here. I don't -- I mean --

10 MS. RICHBURG: Oh, okay. I got you.

11 THE COURT: I mean, I'm not talking about the case.
12 But it looks like this is the same thing that was filed
13 before and you already had a hearing on.

14 MS. RICHBURG: Well, that's the thing, Your Honor.
15 It never was discussed.

16 THE COURT: Okay. Let me hear -- let me hear just
17 so I can get a handle, let me hear from what y'all
18 y'all help me here.

19 MR. MONTGOMERY: If I may --

20 THE COURT: Yes.

21 MR. MONTGOMERY: my understanding of sort of the
22 history, how we got here with discovery. There was a
23 motion -- a motion to compel filed very early on in the
24 case. I had asked Ms. Richburg for an extension. She did
25 not respond. I e-mailed her.

1 And I wrote her a second time and said, You've not
2 responded. I assume you've --you have no problem with an
3 extension. She didn't respond to that and then filed a
4 motion to compel because we didn't serve our responses
5 within 30 days. We had a hearing on that. Judge Couch
6 denied her motion to compel.

7 In the interim, we had answered the discovery for the
8 first set of interrogatories. She then filed a motion to
9 compel based on the answers themselves. That was
10 scheduled for a hearing, I believe, in November. And it
11 was, also, scheduled at the same time that I had filed a
12 motion for a protective order on some of the documents I
13 was willing to give her.

14 The day before that hearing on her motion to compel
15 and the protective order, the three of us had a conference
16 call and we talked for about an hour. And we went through
17 the documents, some of which we said -- we needed some
18 clarification on what exactly she was asking for. She
19 provided some of that. We agreed to look. I responded
20 excuse me. Let me back up.

21 So we had that conversation. When we got in front of
22 Judge Verdin for the protective order hearing, we told her
23 we had talked, we sort of maybe narrowed it down. And she
24 said, If y'all have talked, let me give you 30 days.
25 Y'all , you know, update your responses based on this

1 conversation that you had trying to work it out, and
2 update your responses within 30 days. She also -- we
3 talked about getting the Plaintiff's deposition scheduled.

4 So I know -- I'm not exactly sure when Ms. Hurley
5 responded. But I know I sent a letter, I believe, that
6 was dated December 2nd that provided some additional
7 information and clarified some of my responses. There
8 were some objections, I think. But that sort of
9 transpired in December. And then we got this motion.
10 We'd gotten a second set of discovery in the meantime.
11 And then we got this motion in January.

12 So some of this we have discussed, it's my belief
13 that some of this, at least, with respect to the first set
14 of discovery that we have discussed. Some of it we've
15 answered. Some of it we don't have documents. And we've
16 said that, or tried to explain what they mean. And so
17 then we got the second motion in January.

18 THE COURT: Okay. Is that a pretty fair
19 representation of the history, not the substance, but the
20 history of how we got to this point here today?

21 MS. RICHBURG: I would agree with some. The reason
22 why I have so much detailed information is because Judge
23 Couch instructed me that in my motion to compel -- because
24 Attorney Montgomery is correct. When I asked for the
25 motion to compel is when I did not receive the

1 documented. -- I mean, information in 30 days.

2 So Judge Couch was the one that sort of directed me
3 to say when you file a motion, you must give details as to
4 how and why you're asking for this information. So that's
5 why you see all of these --

6 THE COURT: It's very detailed, too.

7 MS. RICHBURG: Yes. But that's why I'm doing it. I
8 know that I am prose. I don't have expert knowledge.
9 But I try to function as best as I can. So that's why I
10 make sure. Because everything is factual. And that's as
11 it should be.

12 THE COURT: Well, let me ask -- let me ask them.

13 What in your mind have y'all not given -- or have you
14 given?

15 Ms. Hurley.

16 MS. HURLEY: Thank you, Your Honor.

17 I -- I don't know if you've had a chance to see this,
18 but I did file a short response to the motion to compel
19 about a week ago. And I have another copy here.

20 But I have laid out I have laid out the history of
21 our responses, Mr. Williams responses, and sort of
22 identified in there the -- this, Your Honor, just to give
23 you some indication is a copy of everything, my responses
24 to her. We've served multiple responses, along with 38
25 pages of documents from Mr. Williams' file, or that you

1 could get from the -- from the District One records.

2 The last response we served was on January 18th. And
3 that was to produce a confidential document. We were
4 waiting on a protective order to be entered. And once we
5 had that, we felt it was safe to go ahead and produce
6 that. Because the the document we were waiting to
7 produce had a list of the officials who had blocked
8 Ms. Richburg from their assignments, meaning that they
9 had, for some reason, indicated that they did not want to
10 be assigned with Ms. Richburg. That was a document that
11 we produced.

12 But, prior to that, we had produced everything that
13 we either had, or felt like was appropriate. There were
14 some things we objected to.

15 For example, she's asked for Mr. Williams' tax
16 returns. We feel like that has absolutely no bearing or
17 relevance to the incident action. She's asked for
18 information about the gender and -- of -- gender and ages
19 of other officials, which, clearly, is not a relevant
20 issue in this case.

21 She's asked us to give -- she asked for the
22 affiliations of all the District One board members. What
23 we did is we gave her -- the District One board is the
24 body that decided that Ms. Richburg's application for
25 readmittance to the South Carolina Basketball Officials

1 Association for District One would not be accepted if she
2 reapplied for 2016 to 2017.

3 We provided the full names of all the board members,
4 their home addresses, and their e-mails. She, also, asked
5 for their affiliations. We weren't clear on what that
6 meant. But I assume she wants to know what their job
7 information is. And we don't have all that. I mean,
8 these are people who volunteer to do these basketball

9 THE COURT: I'll let you respond when she gets
10 through.

11 MS. RICHBURG: Okay. Thank you.

12 MS. HURLEY: And so I know that that's something
13 we've objected to.

14 I can't remember, but I've, basically, outlined it in
15 here. Now, if there's something else specific -- one of
16 our problems has been it's not quite clear what it is
17 exactly that she still feels like she needs in order to
18 proceed with her case. So if -- if we could narrow it
19 down to say this is exactly what I'm looking for, that
20 would be helpful.

21 But we feel like we have produced everything we have
22 that is not otherwise objectable.

23 THE COURT: All right. And do you have anything
24 specific, Ms. Richburg -- or you wanted to respond.

25 MS. RICHBURG: Yes, sir. I wanted to respond.

1 Based on the -- all the information that I'm asking
2 for would support everything that I communicated in the
3 first complaint that was filed on March, I believe, the
4 31st or -- yeah, on March the 31st.

5 So everything that I listed in my complaint,
6 everything that I've list in the interrogatories, it
7 supports everything that I've communicated in my complaint
8 based on the behaviors and the actions of Rico Williams
9 and the South Carolina High School League.

10 What the attorney just communicated --

11 THE COURT: I guess -- let me ask you this. What,
12 specifically, do you want them to provide?

13 MS. RICHBURG: Everything that -- that is in here.
14 That's why I specifically -- you can see that there's some
15 numbers that I haven't listed, meaning that whatever
16 information they gave me was acceptable.

17 But if they failed to give me the information, that's
18 what I'm asking for. Because it supports everything that
19 I communicated in my first complaint, as well as it
20 counters what was communicated by Mr. Williams when he
21 initiated this e-mail that caused the defamation of the
22 Plaintiff.

23 THE COURT: All right.

24 MS. HURLEY: Your Honor, one other thing just to
25 throw out there. She says there was a set that we never

1 answered. That's not true. We -- we answered it timely.
2 I asserted a number of objections where I could answer. I
3 said we would and --

4 THE COURT: I'll let you respond. You don't have to
5 wave your hand.

6 MS. HURLEY: -- and there -- for a number of items in
7 that second set, we had to rely on the So u th Carolina High
8 School League to provide. So she has it from the high
9 school league. She just didn't get it from us.

10 So I -- you know, our position is why should we
11 have I mean, we don't have it. We're relying on the
12 high school league to produce it. Once it's produced, it
13 shouldn't matter where it came from. It's official league
14 reference.

15 THE COURT: All right. Briefly, so we can move on to
16 another motion.

17 MS. RICHBURG: Yes, Your Honor. As you know, I am
18 prose, so I am trying to follow the protocol.

19 I was told by Judge Couch that when I asked for the
20 first set of interrogatories that I would receive a
21 response from both Ms. Hurley and Mr. Montgomery. And
22 that has been the practice.

23 Now, all of the sudden, maybe months later, I'm
24 hearing from Ms. Hurley just now that now they're deciding
25 when they are selectively making the decision when they

1 want to respond or not. That is a part of the motion to
2 compel so that I can make sure that I'm getting all of the
3 factual information that I need.

4 If it is that they do not have the information, then
5 I will do a request for admission, meaning that they have
6 to say, Ms. Richburg, we don't

7 THE COURT: I know what a request for admission is.

8 MS. RICHBURG: I know. I don't know. But I'm
9 just -- I apologize for rambling.

10 THE COURT: I'm going to have to, obviously, look
11 through this to determine and issue an order on the
12 discovery part. Okay. Because you've gone through
13 you've carefully laid it out in your motion. And I've got
14 your motion here.

15 MS. RICHBURG: And, Your Honor, can I just say one
16 more thing?

17 THE COURT: Yes.

18 MS. RICHBURG: Even with their responses, their
19 responses are counterproductive, meaning Mr. -- Ms. Hurley
20 and Rico Williams will acquiesce to whatever factual
21 information is presented by Mr. Montgomery. Once
22 Mr. Montgomery produces that information and it's not to
23 their satisfaction, all of the sudden they're producing
24 other information.

25 And I communicated that in the summary judgment

1 information whereas it's almost like a flip flop. Oh,
2 we're going to acquiesce to the South Carolina High School
3 League to provide this information. But whatever
4 information the South Carolina High School League
5 provides, now, all of the sudden, when it does not meet
6 their standards or what they think is factual information,
7 then I'm receiving other documentation, some of it being
8 altered, handwritten, very unprofessional. And I feel
9 , like it's highly objectionable.

10 So that is what I have been experiencing with both
11 attorneys. And that was really the major -- that's what
12 really propelled me to do the motion to compel so I could
13 have the judge -- and we could all be on one court.

14 THE COURT: Okay. And the only motion you have
15 pending is the motion to compel; right?

16 MS. RICHBURG: And the only other thing I did was
17 the when they filed the summary -- I did, also, file a
18 notice to dismiss motion and, also, dismiss summary
19 judgment. So I did do that --

20 THE COURT: And that -- and that would be your
21 response to their motion for summary judgment.

22 MS. RICHBURG: Okay.

23 THE COURT: I did see that. That's --

24 MS. RICHBURG: But those are the only two.

25 THE COURT: All right. Now, let's hear about the

1 motion for summary judgment.

2 MS. HURLEY: Thank you, Your Honor.

3 Would you like me to give you a little bit of
4 background facts

5 THE COURT: Yes.

6 MS. HURLEY: about this case?

7 THE COURT: And let me just tell you, Ms. Richburg.
8 You're going to want to -- you know, when she -- what I'm
9 going to do is I'm going to hear from her.

10 MS. RICHBURG: And then you'll let me --

11 THE COURT: Well, y'all tell me. Would it make sense
12 to hear from both of you and then let her respond?

13 MS. HURLEY: Probably

14 THE COURT: Okay. I'll hear from both of them, then
15 I'll let you give a complete response.

16 MS. RICHBURG: Okay.

17 THE COURT: So you may want to take notes.

18 MS. RICHBURG: Okay.

19 MS. HURLEY: Your Honor, thank you.

20 Sarah Day Hurley for Rico Williams

21 I'll just briefly go over the background facts.

22 There are two Defendants in the case, Rico Williams and
23 then the South Carolina High School League.

24 Mr. Williams works for FedEx. But he has for over
25 20 years been a basketball official, which means he

1 officiates basketball games through the South Carolina
2 High School League at the varsity and junior varsity
3 levels. He, also, helps on the side coordinate officials
4 for intramural games at Furman, and games at the Y, and
5 that sort of thing. He just loves basketball. It's his
6 life.

7 So, in 2015 -- in July of 2015, Mr. Williams was
8 elected to become the director of District One of the
9 South Carolina Basketball Officials Association. And
10 District One covers schools in Greenville and Pickens
11 County.

12 And as part of his duties as the District One
13 director, he sets up meetings for officials where they do
14 training, and talk about rules and regulations, that sort
15 of thing. He helps -- he goes to meetings with the other
16 directors and, basically, helps coordinate things and keep
17 things running more or less. And he leads the -- there's
18 a District One board that has about 10 board members, as
19 well all of them are basketball officials as well.

20 So Ms. Richburg, I believe, became a basketball
21 official with District One about three years prior to the
22 events. This was her third -- third year. All of the
23 all of the events here happened in February of 2016, a
24 year ago. And that was Ms. Richburg's third year in the
25 District One.

1 So Mr. Williams had texted the Plaintiff and then
2 followed up with a phone call. And they went back and
3 forth and, finally, connected on the phone. But,
4 essentially, he was trying to reach her. And this is all
5 laid out in his affidavit, by the way, that we filed with
6 our motion.

7 He was attempting to reach Ms. Richburg in order to
8 do two things. One, he wanted to confer with her about
9 her availability to officiate a non-league game that I
10 think may have been at Furman. It doesn't matter, but it
11 was a non-league game. And he had -- he wanted to make
12 sure -- I guess there had been some question about whether
13 the game was still on. He wanted to make sure.

14 As you can imagine, it's his responsibility to gather
15 these people. And he wants to make sure he has their word
16 they're going to be there. Because the game can't go
17 forward if they don't have officials. So he wanted to ask
18 her about that.

19 But he, also, needed to ask her a question about
20 something that had been told to him. And this has all
21 been produced to Ms. Richburg in discovery. But another
22 official named John Williams had reported to Rico Williams
23 a few days earlier that Ms. Richburg had attended a game
24 and officiated a game wearing black jogging pants, tight
25 pants that are not part of the officials approved uniform.

1 Excuse me.

2 And so Mr. Williams said to her, This has been
3 reported to me. Is it true that you were wearing the
4 black jogging pants? And basically -- and this is all,
5 again, laid out in our affidavit and then in the briefs.
6 But she gave him a very short response, said she was at
7 work, and that she doesn't wear such pants, and is that
8 all he had to talk to her about. And so he said, Yes.
9 That's it. Okay. Well -- and he just let it go.

10 A few minutes later that same day after they had this
11 conversation, she sent him a text message. And in the
12 text message, she accused him of harassing her and said
13 that she was going to report his "monopoly status" and how
14 he manipulates the District One organization. She was
15 going to report this to the league, and to his higher ups,
16 and, basically, was complaining about his leadership.

17 So in response to the text message, Mr. Williams then
18 wrote an e-mail to Ms. Richburg and addressed the whole
19 history of their communications and, basically, offered at
20 the end of the communication -- at the end of the e-mail
21 offered to assist in a transfer to another district if she
22 was no longer comfortable with the District One
23 leadership.

24 And in this e-mail, he copied Skip Lax, who is the --
25 or was at the time the commissioner of officials for the

1 South Carolina High School League, who Ms. Richburg knows
2 who he was. And he, also, copied the District One board
3 members. Because it was apparent in the e-mail that
4 that she had expressed disapproval of his leadership
5 actions, and was going to complain to the league. And
6 Mr. Williams could see that this was not going to go away,
7 that he had to address it, especially since she was
8 alleging that he was harassing her. So it escalated from
9 there.

10 But, essentially, her claim against Rico Williams is
11 one of defamation. She says that he defamed her when he
12 sent that e-mail.

13 Now, in her complaint, there's also -- it's not
14 clearly pled, but there appears to be some claim of
15 negligence against the high school league for failing to
16 intervene. Because after this e-mail, Ms. Richburg sought
17 to bring in Skip Lax, the commissioner of officials, and
18 later sought to -- to solicit the assistance of Joedy
19 Moots, who was the officials representative of the high
20 school league.

21 Essentially, she was contacting people at the league
22 to get them involved in her dispute with Rico Williams,
23 which all started because he asked her whether it was true
24 what John Williams had said about what she was wearing to
25 the game.

1 So we have filed a motion for summary judgment. We
2 have exchanged written discovery requests. We have -- we
3 have taken Ms. Richburg's deposition. We've submitted
4 affidavits. And we believe the case is ripe for
5 disposition on summary judgment.

6 And we have two grounds for asking for summary
7 judgment for Mr. Williams. The first ground is based on
8 the truth of what was stated in the e-mail. As Your Honor
9 knows, truth is an absolute defense to a claim of
10 defamation. And, in this case, liable because it was a
11 written communication.

12 Now, in the e-mail, Mr. Williams said several things.
13 And it's a lengthy e-mail. And I've laid it out in our --
14 we filed a brief today, Your Honor, with the Court
15 electronically. And I can provide a courtesy copy, if you
16 need it. But it should be accessible soon.

17 THE COURT: Right.

18 MS. HURLEY: Would you like a courtesy copy --

19 THE COURT: Yes. Well, you know what, here, I've got
20 it. Defendant Rico Williams brief in opposition --

21 MS. HURLEY: This is -- I don't have a filed stamped
22 copy. And I apologize for not filing it sooner. But I've
23 had two parents in and out of the hospital in the last
24 couple of weeks. So it's been kind of rough.

25 So in that brief, Your Honor, if you'll see -- the

1 alleged defamatory e-mail starts on Page 2. And if you
2 want me to stop and give you time to read it, I can do so.

3 THE COURT: Yeah. Let me read it.

4 (Pause.)

5 THE COURT: All right.

6 MS. HURLEY: All right. Your Honor, so we've
7 addressed the items stated in the e-mail. And notably,
8 everything in the e-mail is factual. He's just repeating
9 facts. He's not making derogatory comments about her.
10 He's not expressing negative adjectives. He's just
11 reputing what he views as the facts.

12 So Ms. Richburg has claimed that it's not true, that
13 she was blocked by other officials. Well, we have, in
14 fact, produced the confidential documents showing the list
15 of officials -- according to the league's records as to
16 the officials who blocked her.

17 And we have a document in our record that shows she
18 was blocked by 10 officials, and the dates of those blocks
19 handwritten beside it. And then the league's counsel has
20 produced additional documents showing the two high schools
21 and additional officials who have blocked her.

22 So we have shown that it's absolutely true that at
23 the time Rico Williams wrote this e-mail that Aminah
24 Richburg had been blocked by 10 officials and two high
25 schools, not including the two high schools where she

1 blocked herself because her kids go there.

2 The second item is the complaint about her
3 unwillingness to accept constructive criticism by other
4 officials. That's in Rico Williams e-mail. He testifies
5 in his -- I mean, in his affidavit. He testifies in his
6 affidavit that, yes, it's absolutely true. And what he's
7 doing is saying here to Aminah, these people have reported
8 to me your unwillingness to accept advice and constructive
9 criticism at times. And that is absolutely true. And we
10 believe that's subject to the hearsay exception and
11 perfectly appropriate for the Court to consider on this
12 on this motion.

13 The last item is her poor meeting attendance. And
14 Mr. Williams puts in here in his e-mail to her, We have a
15 record of your coming late to meetings. And that is,
16 also, true. And we've produced records from District One.
17 Their treasurer keeps the records. And he keeps them on a
18 computer. There's no sign-in sheet. It's done by roll
19 call. And we produced those to Ms. Richburg. And so that
20 is, also, substantiated by the documents we produced and,
21 also, the affidavit of Rico Williams.

22 So we have produced records showing that these items
23 in this e-mail are true. And all they have to be is
24 substantially true. And we've proven that they are, in
25 fact, true. And so unless she can now come back with

1 evidence showing that something we said is not true, such
2 that it constitutes defamation, we should be entitled to
3 summary judgment on the basis of truth alone.

4 However, we have a second defense, which is the
5 defense of qualified privilege. And that is sort of akin
6 to you say it only to people on a need-to-know basis. A
7 qualified privilege is oftentimes invoked in the
8 employment setting where a supervisor might send an e-mail
9 to human resources about an employee's job performance.
10 That's considered -- considered to be a privileged
11 communication because it's only communicated to people who
12 have an interest in the subject matter. And it's
13 communicated in a proper form. And I would submit that
14 that is the situation here.

15 And, Your Honor, the Court -- the case law says --
16 and this is in our brief -- that it's the duty of the
17 Court to determine whether a privilege applies when the
18 facts are not in dispute. Obviously, if there's a
19 question of fact as -- a question of material fact as to
20 what was said or who it was said to, that would prevent
21 the Court from ruling on this.

22 But in this particular case, it's not in dispute.
23 The alleged defamation is set forth in writing in the
24 e-mail. And there's no dispute as to who it was sent to.

25 For privilege to apply, it had to -- the

1 communication had to have been made in good faith on a
2 subject matter in which the person communicating had an
3 interest or a duty, and made to a person or persons with a
4 corresponding interest or duty in the -- in the subject
5 matter of the communication. And that is true. The
6 privilege would apply in those instances so long as the
7 privilege is not exceeded or abused. But the privilege
8 applies even if the statement would otherwise be
9 actionable.

10 So, in other words, this second ground for summary
11 judgment is independent of the defense of truth. We would
12 not have to show that both apply in order to get summary
13 judgment. We only have to show one or the other. And
14 either one, we believe, is an independent ground for
15 granting summary judgment to Mr. Williams.

16 Now, it's our belief that Mr. Williams' e-mail was
17 made in a proper manner to proper parties. He puts forth
18 in his e-mail -- or in his affidavit. I keep saying
19 "e-mail." Sorry.

20 He says in his affidavit, look, I had the right as
21 the District One director -- and this is absolutely true
22 under the contract that Ms. Richburg had to sign, as all
23 officials sign. He had the absolute right on his own to
24 say to Ms. Richburg that she could not reapply for
25 membership in the District One SCBOA, but he chose not to

1 do that. He gave her the benefit of the doubt because she
2 was directing her complaints against him. He decided to
3 recuse himself and let the board decide whether to take
4 any disciplinary action against her.

5 And, by the way, it's, also, spelled out in
6 Mr. Rico's -- Williams affidavit that he invited
7 Ms. Richburg to the meeting -- the board meeting at which
8 her status was going to be discussed. And she never
9 she never showed up for that. So she did not attend the
10 meeting in which she was invited to address these issues
11 with the board before they voted on any action to take
12 against her.

13 But the point of this is that the board members
14 historically deal with disciplinary actions of members.
15 And so Mr. Williams thought it was appropriate to copy
16 them on this e-mail to Aminah Richburg because he could
17 see that something was likely to happen with respect to
18 her membership, whether it be a suspension or termination.

19 Similarly, for the same reason, he copied Skip Lax,
20 who is the league's commissioner of officials. He's in
21 charge of membership. He has to notify officials when
22 their applications are rejected. Certainly, this was
23 within the scope of something that would be relevant, and
24 something within his purview of needing to know.

25 The other point about that is that Ms. Richburg

1 herself forwarded Mr. Williams' e-mail to Skip Lax and,
2 also, Joedy Moots, both of whom are commissioners with the
3 South Carolina High School League. So she clearly, also,
4 thought that it was important to get them involved and had
5 no problem with communicating these issues with them.

6 So, at the end of the day, we think if the Court has
7 time to look at the affidavit of Rico Williams and look at
8 our brief, you'll see that there's no dispute as to what
9 communication was made, and who it was made to, and that
10 it was made in good faith, and that the privilege would
11 apply.

12 THE COURT: All right.

13 MS. HURLEY: Thank you.

14 THE COURT: I'll hear from him. And then you can
15 tell me everything you need to tell me.

16 MS. RICHBURG: Okay. Thank you, sir.

17 MR. MONTGOMERY: Thank you, Your Honor.

18 THE COURT: Mr. Montgomery.

19 MR. MONTGOMERY: Again, my name is Michael Montgomery
20 on behalf of the high school league.

21 I, certainly, join in to the arguments made by
22 Ms. Hurley, especially with the defenses of truth and the
23 privilege. We join in those and believe that those have
24 been established.

25 I do -- in case -- I think it's been set forth in our

1 brief, but if the Court has any questions regarding the
2 relationship between the SCBOA and the high school
3 league -- and the high school league bylaws, it gives the
4 high school league the authority to organize these
5 officials organizations for the purpose of certifying
6 officials and supplying officials for high school league
7 games. There's a basketball officials association.
8 There's a football officials association. And then
9 everybody else sort of falls into the South Carolina
10 officials association.

11 And the -- under the SCBOA's bylaws, they have a
12 certain roll carved out for the commissioner of officials,
13 which is somebody designated by the high school league to
14 serve in that role. Skip Lax serves in that role. He
15 still does and was at the time of the case. And he is,
16 also, an associate commissioner of the high school league.
17 He has separate duties and responsibilities for the
18 day-to-day affairs of the high school league. But he,
19 also, serves as the commissioner of officials.

20 And some of the things that the high school league
21 does or his role would be with keeping records.
22 There's a computer software system called Arbiter that,
23 basically, is the sort of software that you use to
24 generate assignments, keep records, things of that nature.
25 The high school league primarily does varsity contests

1 from their office. Arbiter does the varsity scheduling.
2 The local district -- there are 12 across the State. They
3 do what we call sub-varsity, JV, and middle school games.

4 So the scheduling sort of goes through different
5 arenas. But the high school league is in charge of
6 certifying -- helping certify, training, providing
7 educational materials. And the one thing that I think,
8 you know, is important for this case is the one thing that
9 the local districts reserve the right to control, and
10 that's who they allow to be members of the local
11 districts. It -- it -- one of the things that's spelled
12 out is the commissioner of officials duties is if there
13 is -- they notify officials when they are accepted or
14 rejected, but only after the local district has
15 determined.

16 So the high school league can't make anybody be an
17 official of the local district. That decision is sort of
18 left with the local districts who have the sole
19 determination as to who's going to become a member.

20 And in terms of Mr. Moots, who was mentioned, Joedy
21 Moots, he's not a commissioner or an employee of the high
22 school league. Mr. Moots is, actually, a high school
23 principle. And he serves as the officials representative,
24 which is the representative of the officials association.

25 The high school league has an executive committee

1 that sort of is the governing body. It's a representative
2 body of 16 people. There are various entities that have a
3 representative, the superintendant's association, the
4 Department of Education. And the officials association is
5 one of them. And that's who Mr. Moots was sort of -- that
6 was his role during this time period. And -- and so I
7 wanted to be sure I sort of clarified from a factual
8 perspective what his role was.

9 In terms of any defamation claims against the high
10 school league, I'm not really sure that's what's being
11 sought here. Clearly, the high school league, Mr. Lax,
12 did not make any communications to anyone, other than he
13 responded to Ms. Richburg. Mr. Moots as well.

14 In our brief -- our position is that Mr. Moots wasn't
15 acting on behalf of the high school league. He was acting
16 on behalf of the officials association. Nonetheless,
17 Ms. Richburg reached out to him, forwarded him
18 Mr. Williams' e-mail and said, Please advise.

19 Mr. Moots gave his advice, his response. It did not
20 sort of -- did not please Ms. Richburg. She -- there were
21 some communications back and forth. But he, basically,
22 said, I don't see anything that -- that Mr. Williams has
23 done wrong, and things like that. But there was no
24 defamatory communication or anything said about the
25 Plaintiff that would support a defamation claim against

1 the league.

2 What sort of was pled to some extent in the complaint
3 was that there's a negligence claim against the league for
4 not intervening and preventing, I guess, the ultimate
5 result, which was the board -- the district board voting
6 not to accept her application in the future, you know.
7 There's -- if I'm taking that to be the claim, several
8 defenses would apply.

9 One, what Mr. Lax did when -- when Ms. Richburg
10 forwarded him the e-mail, he, basically, said, you know,
11 this is -- this concerns a local concern to be addressed
12 at your district level. He explained in his affidavit
13 Mr. Lax's affidavit that it didn't involve a specific
14 contest or a varsity contest and -- and, therefore, it was
15 a -- it appeared to be a dispute between Mr. Williams and
16 Ms. Richburg to be handled at the district level. So he,
17 basically, deferred it to the district level.

18 So along with that, one, I don't see that there's any
19 duty for Mr. Lax to force himself into that dispute to do
20 it. It's allowed. If you want to call it a discipline
21 issue, the commissioner and the board of directors have
22 the right to to be involved with that. He deferred it
23 to the board of directors of District One.

24 If it's a membership issue, which if you read Rico
25 Williams e-mail, it says You're not going to be assigned

1 to any games until your membership status is reviewed by
2 the district board of directors. Again, going back to the
3 bylaws and the relationship between the BOA and the high
4 school league, the BOA retains the right to determine
5 who's going to be a member.

6 So that was a membership issue, but it's also -- it
7 doesn't involve any varsity contest or any specific
8 issues, other than sort of personality differences.

9 We raised in our -- in our brief that the high school
10 league is a governmental entity, such would be subject to
11 the Tort Claims Act. One -- one thing I did not raise in
12 my memo, but I wanted to be clear I raised to Your Honor
13 is under 15-78-60, which is the Tort Claims Act,
14 exceptions to waiver immunity waiver of immunity,
15 number five provides immunity

16 THE COURT: Wait. What was the section number again?

17 MR. MONTGOMERY: 15-78-60, Section -- Paragraph five.

18 THE COURT: 15-78-60, Paragraph Five.

19 MR. MONTGOMERY: Which would be, basically,
20 discretionary immunity, which says that the governmental
21 entity is not liable for a loss resulting from the
22 exercise of discretion or judgment by the governmental
23 entity or employee, or the performance, or failure to
24 perform any act or service which is in the discretion or
25 judgment of the employee -- governmental entity or

1 employee.

2 And given that Mr. Lax has the discretion as to
3 whether or not to be involved, he exercised that
4 discretion. And just because the Plaintiff does not like
5 what he -- that he what he said or that it was a local
6 matter, that's not grounds for a negligence claim.

7 Again, the sort of -- to claim that the high school
8 league had some absolute responsibility to get involved
9 sort of ignores the fact that it's the -- that it's the
10 local districts that have the membership right to
11 determine who's going to be a member. We can't force
12 somebody to -- to be a member.

13 And so that's partly where Mr. Lax's decision not to
14 become involved and, again, it was Mr. Mr. Moots and
15 Mr. Lax said -- said basically, you know, we don't think
16 that there was anything done wrong here by Mr. Williams.
17 And that continues to be the case.

18 And just because the Plaintiff doesn't agree with
19 that conclusion that they reached doesn't mean that it's
20 negligence based upon the standards which, you know, as --
21 as an official she's an independent contractor. She's not
22 an employee. She doesn't have any particular right to
23 continue "employment" as an official. It's up for --
24 every year it's up. And there doesn't appear to have to
25 be a reason to accept or not accept someone.

1 So, again, for those reasons that we set forth in our
2 brief, unless there are any questions, we will join in
3 with the remaining defenses by Mr. Williams.

4 THE COURT: All right. Ms. Richburg, I'm sure you
5 have a lot to respond to there. I'll be glad to hear from
6 you.

7 MS. RICHBURG: Thank you.

8 I'm glad to hear that you have the patience, Your
9 Honor. But what I have to say is pretty much in line with
10 what you've heard from the Defense, but in a different
11 perspective.

12 The Defendants refer to the e-mail. That's what I
13 referred to earlier. This is what initiated everything.
14 And the big dissertation that you received

15 THE COURT: Well, let me ask you this just just so
16 I can get it clear in my mind. Is the e-mail that is
17 the -- I mean, I realize there's lots of background
18 information --

19 MS. RICHBURG: Right.

20 THE COURT: but is the e-mail the basis of your
21 lawsuit as far as defamation?

22 MS. RICHBURG: That's what initiated it.

23 THE COURT: Okay.

24 MS. RICHBURG: That's what initiated it. And that is
25 why I was leading to this when I submitted the document on

1 the 13th. You will see that I submitted the e-mails that
2 I received from Mr. Williams starting in 2013 up until the
3 present date.

4 In my complaint, I communicated that when I became a
5 member of the South Carolina High School League through
6 District One, which is the Greenville district in the
7 State of South Carolina. Each -- each county has a
8 district. Some counties if they're small, they're
9 included in one district. Greenville County happens to be
10 Greenville and Pickens County. And that's District One.

11 When I became a member then, there was a different
12 president. Her name was Jenny Norris. And when I became
13 a member, Mr. Williams approached me and communicated to
14 me that he assigns games for officials, if I needed to
15 make some extra money. Because he heard me in a
16 conversation with another official say that I was
17 officiating the game so that I could pay for my childrens
18 tuition at Christ Church.

19 So he overheard the conversation and he approached
20 me. So then I have the first e-mail that I received from
21 him, November the 22nd, 2013, where the solicitation
22 started.

23 At the time when I became a basketball official, I
24 was not knowledgeable of the South Carolina Basketball
25 Association's bylaws, their Constitution, the code of

1 ethics. The only thing I was required to do was fill out
2 an application.

3 I'm an employee with Greenville County schools. So I
4 guess that's what gave Ms. Norris the green light. And I
5 have a background in physical education. I've officiated
6 when I was in college. That was a part of my work study.
7 So, yes, I started officiating basketball with District
8 One. But, you know, I did it in college. And I have a
9 long history of officiating.

10 Moving on. The relationship that I had with
11 Mr. Williams was simply business. He would always send me
12 an e-mail or a text giving me an assignment for a game.
13 So what you see in the text when -- remember, this is what
14 he communicated. So I am challenging what he's saying.
15 This is what he sent.

16 But to give you an account of it, he left me a text
17 message saying, Please give me a call at your earliest
18 convenience. It's typical. I've gotten those from him
19 several times. So what I did -- I didn't -- at my
20 earliest convenience, I thought it wasn't a big you
21 know, no rush because he said at your earliest
22 convenience. I had already communicated with Mr. Williams
23 that I was available for the game, I believe, on the 4th.

24 So he kept texting me. So that's the basis of the
25 harassment because he kept texting me. So -- and amongst

1 other things.

2 So after -- when I called him back, I was at work. I
3 was thinking it was a quick call, Rico, I'll let you know
4 that I'll be available for the game. So that's how the
5 conversation went.

6 Aminah, remember I scheduled you for the intramural
7 game at Furman University.

8 I said, Yes, I sent you a text.

9 And he said, Oh, by the way, someone told me that you
10 were wearing tight sweatpants to the basketball game at
11 Beck.

12 And I got real quiet because I was not prepared to
13 hear that. That's never been a part of the conversation.

14 And so I just said to him, I don't own or wear
15 sweatpants. Is that all?

16 And then he said, Well, do you have a problem with
17 discussing this?

18 And I just said, I just told you I don't own or wear
19 sweatpants. Is that all? And then I said to him, I am at
20 work. And I really can't talk at this time. And I need
21 to get off the phone. I said, I sent you a text saying
22 that I was available and I will be there. And that was
23 the end of the conversation, point blank.

24 But what Mr. Williams sent out -- that 's why in my
25 complaint I communicated that what he sent was a

1 fictitious narrative based upon the conversation. You
2 heard Ms. Hurley read the conversation -- I mean read the
3 narrative. So this is all coming from Mr. Williams.

4 THE COURT: All right. But is that -- is there any
5 question that that was the e-mail that was sent out?

6 MS. RICHBURG: This is the e-mail that he sent out.

7 THE COURT: All right. And what in there is not
8 true, other than you said that wasn't the conversation?
9 Was there anything in there that was not true?

10 MS. RICHBURG: When he put on there that, If you
11 remember last year during a JV tournament, all of that was
12 added in. So the only thing was just a quick in and out
13 conversation.

14 So he added that. That 's why I said it was a
15 fictitious narrative, meaning that the information he was
16 presenting was a presentation to blight [phonetic] my
17 integrity in terms of my professionalism with my dress as
18 a basketball official. So that's why I addressed it that
19 way.

20 When I sent the follow-up message to Mr. Williams, I
21 never asked for a transfer. I didn't mention any of that.
22 What I did communicate -- and as you see, I just said,
23 Please continue with the harassing communications. That
24 means that, you know, if you're communicating and it's not
25 about a scheduled game or if you're communicating about

1 hearsay, someone told me that you were wearing tight
2 sweatpants -- that, to me, clearly blighted me and my
3 professionalism in terms of my dress.

4 I am, as I said to you before, a district employee with
5 Greenville County schools. I'm a former administrator. When
6 it comes to professional dress, that's one thing that I
7 hold highly because I present I always present myself
8 professionally at all times. So that's why I communicated
9 that to him.

10 I, also, said that previously District One leaders
11 presented a higher level of professionalism. I was only
12 communicating to him that when he says something about my
13 dress -- and to me it was gender based, based on when he
14 said something being tight, meaning -- I mean, that's how
15 I took it.

16 So what I said to him was that former leaders made
17 officiating enjoyable. So I was only communicating to him
18 my disdain to what he communicated to me to say, at this
19 particular point, this is just how I felt. So that's all
20 I said that it made it that it was -- that -- I'm
21 sorry. That previous District One leaders made -- okay.
22 Let me just move on.

23 THE COURT: Was this after he sent the e-mail?

24 MS. RICHBURG: No. See, this is what he did.

25 THE COURT: Okay.

1 MS. RICHBURG: He took -- he didn't even send the
2 e-mail, Your Honor, until the next day.

3 THE COURT: Okay.

4 MS. RICHBURG: So he sat down and contemplated what
5 he would do. So I thought -- that's why I thought it was
6 insidious and he was making an attempt to blight me as an
7 individual. Because he didn't send anything to Skip Lax
8 that day. He didn't tell me, Aminah, I don't want you to
9 officiate the games at Furman University. I don't want
10 you to officiate the games that Saturday at -- for the
11 junior varsity tournament. He didn't say any of those
12 things to me. He did not communicate. I didn't hear
13 anything from him.

14 And the reason being is because Mr. Williams has a
15 business. Officiating is a business. You have a lot of
16 organizations in the upstate, youth organizations, adult
17 organizations, and all of them want officials.

18 So if they can find somebody that has any context
19 with officials, they can say, hey, we have eight games.
20 Can you provide eight officials for these times for these
21 games? And whoever provides those officials, they get a
22 cut.

23 THE COURT: Right. And I guess what I want you to
24 address, specifically, again, is what in the e-mail is not
25 true?

1 MS. RICHBURG: Okay. So what in the e-mail is not
2 true is where he starts -- if you remember -- and I listed
3 this in the summary. It's all detailed in the summary as
4 well, sir. But I -- would you like for me to go through
5 the summary? Would that be more helpful?

6 THE COURT: Which -- which summary are you talking
7 about?

8 MS. RICHBURG: I did two challenges to the
9 affidavits --

10 THE COURT: Okay. Your -- okay.

11 MS. RICHBURG: Yeah. I did two of them. So if you
12 want me to just do those two, then I could just line for
13 line address everything that

14 THE COURT: All right. And what did you call them?
15 This is your --

16 MS. RICHBURG: This is the challenge to the
17 reliability and validity of the affidavit of Defendant
18 Skip Lax. And then I did another one for Rico Williams.

19 THE COURT: All right. So you tell me what you --
20 all right. I've found that, I think.

21 MS. RICHBURG: So I'm thinking it would be easier for
22 me to just go through the summary since this is what we're
23 addressing. And I've already

24 THE COURT: All right.

25 MS. RICHBURG: Would you rather me do that, sir?

1 THE COURT: Yeah, if you could briefly.

2 MS. RICHBURG: Okay. So if you will recall, when
3 Ms. Hurley mentioned the employment of Mr. Williams at
4 FedEx, that's where I'm starting with when he says, I'm
5 over the age of 18. And he's employed with Federal
6 Express. If you look at two underneath it, I stated that
7 I asked for the tax returns to see where he would list
8 what he does for his business, meaning I know he has a
9 business with providing officials for different
10 organizations. He had not supplied that.

11 So that's why you see that under number two where I
12 said that I asked for that documentation. She just lists
13 that he works for FedEx. But she did not address that
14 Mr. Williams has a business where he provides officials
15 for different organizations in Greenville.

16 For number three where it talked about Mr. Williams
17 experience as an official, they sent me information with
18 all of the members for the South Carolina High School
19 League from 2013 to 2016. And with the factual
20 information that was communicated by Ms. Hurley and
21 Mr. Montgomery, they mentioned the document that came
22 under the protection order where they 're stating that
23 Mr. Williams stated the truth about the 10 officials that
24 blocked the Defendant.

25 If you will look, I placed a chart. And in that

1 chart -- I think the chart is under number -- it starts --
2 you can look at number 29.

3 THE COURT: All right.

4 MS. RICHBURG: When I gleaned all of the information
5 that was sent by the South Carolina High School League and
6 Ms. Hurley where they're saying truth -- to say that the
7 summary judgment that they're asking for is based on
8 truth. Out of the 10 officials that they sent under the
9 protection order, seven of those officials aren't even
10 South Carolina High School League basketball officials.
11 And that's for the entire state of South Carolina. I
12 gleaned all of the list of all of the officials.

13 So when you look at that chart where it says

14 THE COURT: Well, does the affidavit say that -- it
15 just says 10 officials.

16 MS. RICHBURG: Right. It says 29 in my e-mail to

17 THE COURT: No, no. The e-mail from him says 10
18 officials. It doesn't limit on any particular -- it
19 doesn't describe them as a specific...

20 MS. RICHBURG: See, we're dealing with --

21 THE COURT: I'm dealing with his e-mail. That's what
22 we're talking about.

23 MS. RICHBURG: Right. And what I'm saying is

24 THE COURT: And I don't need all that background I
25 mean, all the stuff that you've got -- I mean, you know, I

1 want you to tell me, specifically, about the e-mail that
2 he sent you, which is the basis of your complaint. You
3 tell me all the reasons why that is not true.

4 MS. RICHBURG: All right. So, again, I'll just go
5 through it where it says, If you remember, starting there.
6 That is not true. Where he put, Even though your
7 responses were short, terse, and rude, that is his -- he
8 is stating that. That is not -- that's coming from him.
9 That is his opinion.

10 The e-mail -- I've already communicated that I had an
11 old flip phone at the time. So I don't have access to
12 this e-mail. So I -- I can't even recall what I sent. So
13 I've already communicated that.

14 THE COURT: Okay.

15 MS. RICHBURG: When he says, I received requested
16 information, there was no requested information sent from
17 Bob Wnukowski or Kevin Brown. They did not request any
18 information.

19 And when it says, You were marked off by two schools,
20 in the [inaudible] system, the two schools that are marked
21 off are Southside High School where I attended high school
22 and Mauldin High School in the zone which I reside.

23 But in the context in which the information was
24 used that's what I communicated in my first complaint
25 that in the context in which it was used, it was used to

1 blight me to say that she doesn't get along with
2 officials. She has these schools that have blocked her.
3 Therefore, there is justification in my termination of her
4 as a member.

5 So that's where -- when it says by the 10 officials.
6 At that particular time, there are no 10 officials that
7 have blocked me. We're speaking South Carolina Basketball
8 Officials Association. So when they sent that e-mail to
9 say 10 officials blocked me, 10 officials did not block me
10 from the South Carolina Basketball Officials Association.
11 This is what this is in reference to. I don't even
12 know I officiate football. I officiate volleyball. I
13 do lacrosse. And I do softball.

14 THE COURT: All right. Keep going on the e-mail.

15 MS. RICHBURG: Okay. I'll keep going. Okay. So I
16 will say that the two schools as represented by
17 Mr. Williams were used out of context.

18 THE COURT: Okay.

19 MS. RICHBURG: The 10 officials were used out of
20 context.

21 THE COURT: Okay.

22 MS. RICHBURG: When he communicated, Many of them
23 have indicated to me your unwillingness -- no one came
24 there were no 10 officials that came to Mr. Williams
25 during the 20 I mean 2015, 2016 basketball season to

1 say that I have an unwillingness to accept constructive
2 criticism. That did not happen.

3 THE COURT: Okay.

4 MS. RICHBURG: So that is not true.

5 Then he puts, Additionally, before the season, I
6 required officials work in other South Carolina schooling
7 sports to attend four games. And I have, Your Honor. If
8 you want to look -- I don't have a copy for you to keep.
9 But this is what was sent to me --

10 THE COURT: Well, just tell me what it is.

11 MS. RICHBURG: Okay. It's just evidence that shows
12 that I attended four games, which was required. So when
13 he put that I did not attend four required meetings, I did
14 attend four required meetings. And I have the
15 documentation to support it. So that is not true.

16 Then --

17 THE COURT: Well, actually, he states that you
18 attended late. Based on the sign-in sheets, you didn't
19 it didn't constitute four because you didn't make the
20 whole meeting.

21 MS. RICHBURG: And that is why in my interrogatories
22 I asked for copies of sign-in sheets. And they do not
23 exist.

24 THE COURT: Okay.

25 MS. RICHBURG: Because at the meetings I attended --

1 this is for all officials. There is no sign-in sheet for
2 officials. When you come, you get credit for attendance,
3 period. That's how it is done. No one is sitting there
4 giving any indication in terms of any time anyone attends
5 the meeting I mean arrives at the meeting or departs.
6 There is no in and out sign-in sheets.

7 THE COURT: Okay.

8 MS. RICHBURG: So that was part of the interrogatories.
9 So when he presented these times, those were times he
10 created.

11 THE COURT: Okay.

12 MS. RICHBURG: There's nothing on record to support
13 any of that. And that is how he, for some reason,
14 communicated some justification that I attended two and a
15 half meetings, which is a false statement.

16 THE COURT: Okay.

17 MS. RICHBURG: In addition, when he listed all of
18 these other meetings, we were only told that we were
19 required to attend four meetings.

20 THE COURT: Okay.

21 MS. RICHBURG: And directors in the past and even for
22 other sports -- when the directors in all sports know that
23 you're doing other sports, there's a level of camaraderie
24 and empathy --

25 THE COURT: All right.

1 MS. RICHBURG: -- if they know that you're
2 officiating another game.

3 THE COURT: Okay. I mean, you got -- you're just
4 address the meeting there. All right.

5 MS. RICHBURG: And then when he says, Upon realizing
6 these facts, I contemplated removing you from the
7 tournament. Well, my argument was that if I did anything
8 that was inappropriate, that was unprofessional, that
9 would blight myself where I

10 THE COURT: Well, this is just saying what he
11 contemplated. I mean --

12 MS. RICHBURG: Oh, okay. All right. Well, okay.

13 So then when he says, Without repeating word for word
14 your comments concerning professionalism, declining
15 standards, I did not state -- if you would read the
16 e-mail, I never stated that my membership was not being
17 served adequately. I have already communicated that I'm a
18 single parent. And for me to even officiate in a
19 different district would be taxing and stressful because
20 of the time required to go on the road to --

21 THE COURT: Well, he's just stating his opinion
22 that -- what he feels that your comments are. Okay.

23 MS. RICHBURG: Okay. And then when he says, I and
24 we, I'm like what is I and we? I don't clearly understand
25 that. But this is -- this is coming from Mr. Williams. I

1 never communicated any of those things. The only thing I
2 communicated to Mr. Williams is, frankly, the conversation
3 I do not wear sweatpants --

4 THE COURT: All right. Let's just stick to the
5 e-mail.

6 MS. RICHBURG: All right. And, as I said before,
7 there was no discussion about me transferring to any
8 district. This is -- everything was coming from
9 Mr. Williams.

10 THE COURT: All right.

11 MS. RICHBURG: And the other thing to support when
12 I -- in the e-mail when it said something about
13 communicate your monopoly status with assigning games with
14 various organizations, and how it manipulates the District
15 One organization. The only thing that I was referring to
16 was when I looked at the code of ethics, it says, quite
17 frankly, that solicitation is not allowed.

18 So that's all I was communicating was that I thought
19 that there was a conflict of interest because he's calling
20 me about

21 THE COURT: Well, that's your statements and not his.

22 MS. RICHBURG: Yes.

23 THE COURT: I mean, again, I'm going to have to
24 review this matter.

25 All right. Any final points?

1 MS. RICHBURG: Okay.

2 THE COURT: Because they've got to respond, and it's
3 10 till 5:00.

4 MS. RICHBURG: Right. I understand, Your Honor.

5 THE COURT: Go ahead.

6 Ms. RICHBURG: What I heard from the Defendants, they
7 were saying that in their summary judgment that it all
8 should be based on truths. Well, my argument is that the
9 information is not truthful and a lot of the facts are
10 taken out of context and are presented in a false
11 narrative to blight me.

12 On the South Carolina High School League site, it
13 lists the responsibilities of the officials
14 representative. It clearly communicates the
15 responsibilities of the commissioner.

16 So the commissioner, it was his job to intervene. If
17 you will see in the e-mails, the commissioner just --
18 quite frankly, just brushed it off. And he did not
19 address it.

20 When I communicated then to the officials
21 representative on-site, the officials representative
22 shared my communication with him with Rico Williams. And
23 that was discussed in the board meeting.

24 THE COURT: Okay.

25 MS. RICHBURG: So I felt that that information was

1 confidential. Anything that I communicated and shared
2 with Mr. Moots -- he's an officials representative. None
3 of that information should have been shared at that board
4 meeting.

5 But what Mr. Moots failed to share at the board
6 meeting, as Mr. Montgomery mentioned, that -- in our
7 correspondence when he sent an e-mail and when he
8 acknowledged I have known Rico Williams for many years and
9 was giving him all of these accolades. And then I
10 responded to him to say that you're sounding more like a
11 directors representative than an officials representative.

12 So once I sent my other plea to Mr. Moots in the last
13 e-mail that he sent me

14 THE COURT: Well, now, we need to stick to things
15 relative to him. I know you're bringing a lot -- a lot of
16 stuff here. But we're talking about, you know, responding
17 to their motion for summary judgment.

18 MS. RICHBURG: Right. And the

19 THE COURT: And defamation.

20 MS. RICHBURG: Right. And the reason why I'm
21 mentioning Mr. Joedy Moots is because Mr. Montgomery
22 mentioned Mr. Moots. So I'm just following up just to
23 communicate with you that in the communication that I had
24 with Mr. Moots when I communicated what was going on with
25 my situation, Mr. Moots did say, Aminah, you are correct.

1 I only went on what was said in the e-mails and texts. I
2 didn't mean that you were insubordinate. But if someone
3 on my staff talked to me like that, I would consider it
4 insubordination. Believe me, the basketball directors and
5 I have gotten into many disagreements because I'm always
6 taking up for my officials. But you can't win an argument
7 with your director because they have too much power within
8 the organization. You have to find a way to get along.
9 Like I said --

10 THE COURT: All right.

11 MS. RICHBURG: -- I have no knowledge of your
12 officiating ability. I can definitely see that there's a
13 personality conflict

14 THE COURT: I'm sorry. I don't see how that relates
15 to any of the issues that we're discussing here.

16 MS. RICHBURG: The only reason why I'm bringing it
17 up

18 THE COURT: I mean, I don't need detail on every
19 little thing on this e-mail. Because we're going to be
20 here all night if you start reading every e-mail.

21 MS. RICHBURG: Okay. The only -- the only reason why
22 I read the e-mail is just to bring clarification to say
23 that even when I responded to the officials
24 representative, the officials representative did
25 communicate to me that my plea -- that in my plea that I

1 was correct and that the position that Mr. Williams has
2 taken was one that was unwarranted.

3 THE COURT: Okay. Now, that -- I mean, see, that was
4 a lot easier than reading the whole thing.

5 MS. RICHBURG: Okay.

6 THE COURT: All right. And, again, I'm not trying to
7 cut you off, because I want you to tell me everything you
8 need to. But I've just got to, you know, focus down on
9 what the issues are here.

10 All right. Anything else you want to provide?

11 MS. RICHBURG: And the other thing is that the South
12 Carolina High School League, they fall under the Freedom
13 of Information Act. They are a governmental entity.

14 So anything pertaining to torts, it applies to the
15 South Carolina High School League as well. They are not a
16 separate entity where they don't fall under the same
17 jurisdiction if their behaviors are that of unjust
18 behavior -- organizational behavior that is, sir.

19 THE COURT: All right. Any brief response?

20 MS. HURLEY: Just quickly, Your Honor. I just wanted
21 to remind you that this all started with a text that
22 Ms. Richburg sent to Rico.

23 THE COURT: Yeah.

24 MS. HURLEY: And that's in the e-mail. He repeats
25 it. And her text is, actually, pled in the complaint,

1 too.

2 THE COURT: Okay.

3 MS. HURLEY: So there's no issue as to what the text
4 said.

5 THE COURT: Okay.

6 MR. MONTGOMERY: And, Your Honor, if -- if it
7 matters -- if it doesn't, let me know. But to address the
8 blocks where Ms. Richburg said some of the blocks weren't
9 basketball officials, we explained when we produced it,
10 the high school league has access to all varsity sports
11 that she officiates.

12 So those 10 blocks, three of them were basketball
13 officials. And the other seven were from other sports.
14 The blocks that Mr. Williams produced, which I can hand up
15 if you'd like, but it -- it sort of verifies everything
16 and we've attached these as exhibits to our motion -- to
17 our memo.

18 But for the blocks that were produced subject to the
19 protective order, in the top right, it's got Bob
20 Wnukowski, who's referenced in the e-mail where he says, I
21 requested information from Bob Wnukowski and Kevin Brown.
22 Well, here you see Bob Wnukowski, he's the administrator
23 who pulls the 10 blocks that would be accessible by the
24 BOA for sub-varsity contest. So that, actually, supports
25 the fact that Rico didn't make them up. He asked Bob

1 Wnukowski to provide them.

2 Secondly, he, also, mentions Kevin Brown. Kevin
3 Brown was the treasurer of District One. And we've
4 attached his memo -- exhibits to our memo. His sign-in
5 sheets -- or he created a document based on an Excel
6 spreadsheet. And he writes it and signs it, Kevin Brown,
7 I attest that this is true, where he takes all of those
8 dates that people came in late. It's not just
9 Ms. Richburg. There are other officials where he says,
10 Came in at 6:50, came in at 7:15, left early.

11 MS. HURLEY: And he kept it in real time.

12 MR. MONTGOMERY: And he kept in real time. But he
13 went back from the spreadsheet and created this document
14 which was produced in this case.

15 The other thing, too, Exhibit E to my memo is the
16 e-mail that Ms. Richburg forwarded to Skip Lax. And about
17 halfway down, it says -- or Ms. Richburg writes, It is
18 true that I attended three meetings this year. That sort
19 of confirms what Rico said, which was the equivalent based
20 on the time sheets of two and a half.

21 So she's admitting when she sends this to Mr. Lax
22 that she didn't attend all four meetings. I wanted to be
23 sure that that was referenced

24 THE COURT: Right.

25 MR. MONTGOMERY: Right. So unless there's anything

1 else that you think needs clarification --

2 THE COURT: All right. Very briefly. Because,
3 basically, I'm going to have to review all this matter
4 anyway.

5 MS. RICHBURG: Right. And I understand that, Your
6 Honor. I just want you to see that that's what I eluded
7 to earlier. When I first asked for -- when I first wrote
8 the complaint and the answers to the interrogatories, the
9 first list that was given to me, as I communicated to you
10 before, seven of the members -- seven of the names were
11 not members of the basketball association.

12 And then Mr. Williams created another list. And I
13 even broke down that list for you, Your Honor, as well.
14 Even in that list, if you will look, that is on the
15 summary.

16 THE COURT: Okay.

17 MS. RICHBURG: The challenge.

18 THE COURT: And I'll look through that.

19 MS. RICHBURG: Yeah. You will see that there are
20 one, two, three, four, five, six officials where they have
21 not been scheduled. I've never even had a game scheduled
22 with any of those officials. And the last official that
23 is on the list, there was no block for that official
24 because I officiated the game.

25 THE COURT: All right. Here's what I'm going to do,

1 I'm going to review all of the information that y'all have
2 provided, including what's in the file. If I need any
3 additional information, I will let you know, both parties,
4 by letter.

5 Do we have your e-mail address? Do you correspond by
6 e-mail or mail?.

7 MS. RICHBURG: Yes. I -- my e-mail address, I can
8 give it to you.

9 THE COURT: Well, make sure the clerk has it.

10 All right. And then in the event -- then otherwise,
11 I -- if I -- any rulings that I have, I will either
12 prepare an order or ask one of the parties to prepare an
13 order, and express that by e-mail. And if we do that,
14 then the only thing you'd need to respond to would be a
15 final order.

16 MS. RICHBURG: So what would I be receiving?

17 THE COURT: You'll be getting you'll be getting
18 anything via e-mail if I -- either my decision or if I
19 need additional information, I will correspond

20 MS. RICHBURG: So your decision -- what decisions are
21 you going to send?

22 THE COURT: Well, you will -- whatever I --
23 whatever all my communications will come to all parties
24 at the same time by e-mail.

25 MS. HURLEY: I believe Steve Lopez has communicated

1 with her.

2 THE COURT: All right. I'm sure the clerk has it.

3 THE CLERK: I'm going to check just to make sure.

4 THE COURT: All right. And I will let y'all know as
5 soon as possible. There's a lot of stuff to go through.

6 *****EN D OF TRANSCRIPT OF RECORD*****

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CERTIFICATE OF REPORTER

STATE OF SOUTH
CAROLINA COUNTY
OF GREENVILLE

I, HOLLIE JENKINS , Official Court Reporter
for the Thirteenth Judicial Circuit of the State
of South Carolina, do hereby certify that the
foregoing is a true, accurate, and complete
Transcript of Record of the proceedings had and
the evidence introduced in the captioned case,
relative to appeal, in the Court of Common Pleas
for Greenville County, South Carolina, on the 20th
day of March, 2017.

I do further certify that I am neither of
kin, counsel, nor interest to any party hereto.

August 17, 2017

Hollie M. Jenkins,
)
Court Reporter My

Commission Expires: 09/24/20

(SCHSL)South Carolina High School League's Memorandum in Opposition to Plaintiff's Motion to Compel
and in Support of its Motion for Summary Judgment

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

IN THE COURT OF COMMON PLEAS

Aminah A. Richburg,)
Plaintiff,)

Civil Action No. 2016-CP-23-02113

vs.)

**SOUTH CAROLINA HIGH SCHOOL
LEAGUE'S MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S
MOTION TO COMPEL AND IN
SUPPORT OF THE DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

E.A. "Rico" Williams, Director,)
District One S.C. Basketball)
Officials Association, and the South)
Carolina High School League,)
Defendants.)

The defendant, South Carolina High School League ("SCHSL" or "League"), by and through its undersigned attorneys, hereby submits its Memorandum in Opposition to Plaintiff's Motion to Compel and in support of its Motion for Summary Judgment. As set forth more fully below, the plaintiff's latest Motion to Compel is unfounded and does not involve topics that impact the issues raised in defendants' dispositive motions, and therefore, the SCHSL's motion should be granted.

PROCEDURAL BACKGROUND

The plaintiff filed this lawsuit on March 31, 2016. The allegations and claims arise out of a dispute between the plaintiff and the defendant, Rico Williams and the District One of the South Carolina Basketball Officials Association (SCBOA), which began on or around February 2, 2016. In her Complaint, the plaintiff alleged a cause of action for defamation and asserted that Rico Williams created a "false narrative" about the plaintiff's performance as a basketball referee in reporting issues that involved the plaintiff to the

District One Board of Directors. Rico Williams denies these allegations and has asserted a number of defenses, including the affirmative defenses of qualified privilege and truth. Ultimately, the District One Board of Directors voted on February 29, 2016, to inform the plaintiff that any future application to District One would not be accepted. Plaintiff was invited to attend this meeting but did not do so. The allegations relating to the SCHSL appear to be that the SCHSL improperly failed to investigate the reports by Williams regarding the plaintiff. The SCHSL denies that it had any duty to oversee Williams' actions in this regard. Furthermore, the SCHSL denies that the SCHSL or Williams committed any actionable torts against the plaintiff.

With respect to the pending Motions, the undersigned asserts that it may be more helpful to address the summary judgment issues first, so that the court may see that dispositive issues are not affected by the plaintiff's Motion to Compel. To that end, the SCHSL asserts that summary judgment is appropriate for three reasons: (1) the SCHSL did not make any communications that were defamatory; (2) communications between the SCHSL and the SCBOA (including Rico Williams) are protected by the defenses of qualified privilege and truth; and (3) the claim against the SCHSL couched in negligence is not actionable.

FACTUAL BACKGROUND

As previously stated, this case involves a dispute that arose between the plaintiff and Rico Williams, the District One Director of the SCBOA. The SCBOA operates under the SCHSL, and the SCBOA is responsible for the training and development of basketball officials, along with the maintenance of a booking office for basketball contests between schools that are members of the SCHSL. The SCBOA has its own constitution and bylaws,

and members of the SCBOA are divided into twelve regional districts. Each district has a director and a board of directors. See Affidavit of Rico Williams, filed February 24, 2017.

The SCHSL consists of approximately 400 high school and middle school members throughout South Carolina. Day-to-day operations of the SCHSL are conducted by the League's staff of approximately ten individuals, and the SCHSL has its own separate constitution and bylaws. Under the bylaws of the SCBOA, there is a position entitled "Commissioner of Officials," which is to be appointed by the Executive Committee of the South Carolina High School League. For the relevant period, Skip Lax, Associate Commissioner of the SCHSL, was appointed to serve as the Commissioner of Officials for the SCBOA. The SCHSL works closely with the SCBOA with respect to training and certification of officials, keeping and maintaining records and ratings of officials, and assigning varsity contests through its software system, Arbiter. See Affidavit of Skip Lax, filed February 27, 2017.

The plaintiff, Aminah Richburg, joined District One of the SCBOA in 2013. As part of her membership, the plaintiff was required to sign a contract specific to District One. See SCBOA District 1 Contract, attached as Exhibit A. The contract included the following provisions:

6. I understand that I must meet all required state and district meetings and that failure to meet the requirements can result in the loss of cooperation points.
7. I understand that as a member of District 1 I represent all officials of District 1 and of the South Carolina Basketball Officials Association. I will conduct myself in a professional and ethical manner at any basketball event whether or not I am a spectator or working the game.

Four days later, Plaintiff forwarded Mr. Williams' email to Skip Lax and asked him to intervene. Mr. Lax declined to do so. (*See Copies of emails between Aminah Richburg and representatives of SCHSL*, shown in Exh. F to Defendant SCHSL's Memorandum in Support of Motion for Summary Judgment). On February 16, Plaintiff forwarded Mr. Williams' email to Joedy Moots, the SCHSL Officials Representative, and asked him to "advise" on the matter. (*Id.*). Mr. Moots advised Plaintiff that she needed to learn to work better with others. Disappointed with Mr. Moots' response, Plaintiff wrote to him a couple more times. Notably, on February 24, 2016, in an email to Mr. Moots (on which Rico Williams was not copied), Plaintiff described Rico Williams as "an ignorant man" who "displayed his lack of professionalism and leadership ability as the District One Director." (*Id.*).

Argument and Citation of Authorities

Rule 56 of the South Carolina Rules of Civil Procedure allows the Court to enter summary judgment when there is no genuine issue of material fact and the moving party is entitled to judgment as a matter of law. "In determining whether any triable issues of fact exist, the court must view the evidence and all reasonable inferences that may be drawn from the evidence in the light most favorable to the non-moving party." David v. McLeod Regional Medical Center, 367 S.C. 242, 626 S.E.2d 1, 3 (2006). In responding to a properly supported motion for summary judgment, the plaintiff cannot rest on allegations in the pleadings, but "must set forth specific facts showing that there is a genuine issue for trial." S.C.R.Civ.P. 56(e). See also Sides v. Greenville Hosp. System, 362 S.C. 250, 607 S.E.2d 362, 364 (Ct. App. 2004) ("Once the moving party carries its initial burden, the opposing party must come forward with specific facts that show there is a genuine issue of fact remaining for trial.").

8. I understand that the District 1 director has the authority to enforce professional standards and to accept or reject my transfer to another district or readmittance to the SCBOA.
9. I understand that I may be put on probation, and/or suspended, or dismissed if I fail to conduct myself in a professional manner as a District 1 basketball official and if I fail to follow District 1 guidelines as listed in this contract.

(Exhibit A).

Additionally, the SCHSL promulgates a Code of Ethics that is signed by every member of the SCBOA. *See* Code of Ethics, attached as Exhibit B. The provisions of this document cover various ethical and professional practices, and include (a) an acknowledgement that a basketball official is an independent contractor and not an employee of the SCBOA or SCHSL; and (b) an acknowledgement that "I understand and agree that either school retains the authority not to employ my services."

With respect to the origins of the present dispute, on or about February 2, 2016, the defendant, Rico Williams, received information from another official, John Williams, who officiated a middle school basketball game with the plaintiff on February 1, 2016. John Williams informed the defendant, Rico Williams, that the plaintiff wore "jogging/workout" pants during the basketball game. *See* Affidavit of Rico Williams, ¶ 22. These kinds of pants are not approved attire for basketball officials, as the SCBOA bylaws require "straight leg black trousers without cuffs" that may be pleated or plain front. Additionally, Rico Williams had previously spoken to the plaintiff the year prior about an incident in which she wore inappropriate pants to an assignment.¹

¹ The plaintiff did not dispute this fact in her deposition when asked whether Rico Williams spoke to her a year prior after a basketball tournament, as she responded, "You know, I don't know. I can't recall at this time." *See* deposition testimony of plaintiff, p. 88, ll. 2-8. Portions of plaintiff's deposition testimony are attached as Exhibit C.

After Rico Williams left several messages for the plaintiff requesting contact, the plaintiff called Rico Williams on February 3, 2016. In that conversation, Rico Williams confirmed an upcoming assignment for the plaintiff at Furman University, and he informed her that it been reported to him that she was wearing jogging pants at the recent middle school basketball game. He asked Ms. Richburg if the report was true. Ms. Richburg replied that she doesn't wear jogging pants. Rico Williams then asked if it was problematic that he was asking that question, and the plaintiff repeated that she does not wear jogging pants and that she was at work. Rico Williams did not dispute the plaintiff's response and agreed to end the call, stating they would talk again soon. *See* Affidavit of Rico Williams, ¶¶ 24-25. Notably, the plaintiff did not dispute this description of the February 3rd telephone call in her deposition.

A few minutes after ending the call with the plaintiff, the plaintiff sent the following text message to Rico Williams:

Please discontinue the harassing communications. Previous District One leaders presented a higher level of professionalism which made officiating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL.

(Affidavit of Rico Williams, ¶ 26).

On February 5, 2016, Rico Williams emailed the plaintiff and copied in the District One Board of Directors and the Commissioner of Officials, Skip Lax. After recapping the prior telephone conversation, Rico Williams quoted the text message sent by the plaintiff. Mr. Williams concluded the email with the following paragraphs:

I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked off by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials or officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept. 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 1/2 meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1 member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc. it is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route that you deem favorable.

(Williams Email of 2/5/16, attached as Exhibit D).

The plaintiff alleges that this email (hereinafter referred to as the "February 5th email") created a "false narrative" about her, which led to a decision by the District One Board of Directors at their meeting on February 29, 2016, in which the Board of Directors

voted not to accept any future applications of the plaintiff into District One of the SCBOA.²

Through the course of discovery, the plaintiff has produced no evidence to show that (a) the SCHSL made any defamatory communications about the plaintiff; (b) the statements communicated in Mr. Williams' email were untrue; (c) Mr. Williams (or anyone else) acted with malice so as to exceed any qualified privilege enjoyed between the SCHSL and the SCBOA; and (d) the SCHSL was negligent in its handling of this matter.

I. The SCHSL did not make any defamatory communications

In this case, it is undisputed that the recipients of the February 5th email were members of the District One Board of Directors and Commissioner of Officials, Skip Lax. Moreover, there is no evidence that Commissioner Lax responded to the email from Rico Williams, nor is there any evidence that Commissioner Lax forwarded the email to anyone else. Thus, summary judgment is appropriate for the SCHSL on the basis that Commissioner Lax did not make or publish any defamatory statements. See Holtzscheiter v. Thomson Newspapers, Inc., 332 S.C. 502, 506 S.E.2d 497 (1998) (holding the elements of defamation include: (1) a false and defamatory statement concerning another; (2) an unprivileged publication to a third party; (3) fault on the part of the publisher; and (4) either actionability of the statement irrespective of special harm or the existence of special harm caused by the publication).

Some additional factual background information may be instructive in light of the plaintiff's anticipated arguments. After the plaintiff received the February 5th email, she forwarded the February 5th email herself to Commissioner Lax, along with a lengthy

² It should be noted that the SCHSL season for junior varsity and middle school basketball had ended by this point. Additionally, membership into the SCBOA has to be renewed annually.

message. (See Exhibit E). The plaintiff did not explicitly ask Commissioner Lax to intervene or to do anything in particular, and she expressed her displeasure with Rico Williams and his February 5th email. Additionally, she requested the names of the officials who "blocked" her, as referenced in the February 5th email. Commissioner Lax responded to the plaintiff's email by simply stating, "Aminah, we do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level."

In his affidavit, Commissioner Lax explained that blocks against officials are not shared because blocks can be specific to certain sports, and because no reason is required by an official or a school to "block" another official. See Lax Affidavit, ¶¶ 10-11. Thus, these blocks are not disclosed in order to promote the integrity of contests and the working relationships of officials and schools who may only be "blocked" in particular sports. *Id.* Commissioner Lax also explained that he felt the plaintiff's concerns were a local matter because she was primarily concerned with the actions of the district director, Rico Williams, and the issues did not involve varsity scheduling or a specific contest. *Id.* at ¶ 15.

As previously stated, there is no other written communication produced in this case by Commissioner Lax, other than his response to plaintiff's email. Therefore, plaintiff's defamation claim against the SCHSL fails as a matter of law.

Plaintiff has also complained about communications she had with an individual named Joedy Moots. Mr. Moots was the principal at Gray Collegiate Academy in West Columbia, South Carolina, and he also served as the Officials' Representative on the Executive Committee of the SCHSL in 2015-2016. The Executive Committee is the

governing body of the SCHSL, and it is comprised of 16 representatives from various schools and organizations, including the South Carolina Officials' Association.

On February 16, 2016, the plaintiff forwarded Rico Williams' February 5th email to Mr. Moots and stated, "You are listed as the Officials Representative please advise on this matter." (Emails between Mr. Moots and the plaintiff are attached as Exhibit F). Following the plaintiff's initiation of communication with Mr. Moots, several more emails were exchanged between Mr. Moots and the plaintiff. It appears that Mr. Moots also forwarded his initial email response from February 22, 2016, to Rico Williams.

To the extent that plaintiff argues that Mr. Moots committed actionable defamation by forwarding his February 22nd email response to Rico Williams, this argument fails as a matter of law. First, Mr. Moots was not acting on behalf of the Executive Committee or the SCHSL. Instead, he was acting as a representative of the South Carolina Officials' Association *in response to* the plaintiff seeking him out for advice. Secondly, the emails from Mr. Moots are not defamatory toward the plaintiff. While the plaintiff did not like the response she received from Mr. Moots, the substance of Mr. Moots' email did not defame her in any way. See Erickson v. Jones Street Publishers, LLC, 368 S.C. 444, 629 S.E.2d 653 (2006) (stating that "[t]he law of defamation does not prevent a person from expressing and publishing truthful or non-defamatory statements- including pointed criticisms- of a guardian's actions in a particular case, regardless of whether the guardian is designated a public official, public figure, or private figure"). Finally, plaintiff's defamation claim that is based on Mr. Moots' emails is barred by the plaintiff's own self-publication. See Murray v. Holnam, Inc., 344 S.C. 129, 542 S.E.2d 743 (2001) (noting that, as a general rule, when an allegedly defamed person repeats the defamatory

communication to others, self-publication will not support a defamation action against the originator of the statements) (citing 50 Am. Jur. 2d *Libel and Slander* § 241 (1995)).

Accordingly, for the foregoing reasons, the plaintiff has not presented any evidence of any defamatory statements made by the defendant, South Carolina High School League.

II. Mr. Williams' statements were true

Both defendants have asserted the absolute defense of truth in this case. South Carolina courts have held that truth of the matter is a complete defense to an action based on defamation. See *Ross v. Columbia Newspapers, Inc.*, 266 S.C. 75, 221 S.E.2d 770 (1976). In fact, the defense of truth is sufficient where the evidence establishes that the statement was *substantially* true. *Id.* (citing *Dauterman v. State-Record Co.*, 249 S.C. 512, 154 S.E.2d 919 (1967)) (emphasis added).

In this case, the following factual statements were included in Rico Williams' February 5th email that are allegedly defamatory: (1) Ms. Richburg was marked off/blocked by two schools and ten officials; (2) all of the officials that had blocked the plaintiff were rated higher than the plaintiff; and (3) the plaintiff had technically not attended all of the required District 1 meetings. As shown below, all of these statements are true.

A. Blocks by Schools and Officials

Given the reasons stated earlier for protecting the disclosure of blocks by schools and officials, the SCHSL moved for a Protective Order to govern the disclosure in this litigation of blocks against the plaintiff. After a hearing and ruling by Judge Verdin granting the Protective Order, both the SCHSL and Rico Williams provided a list of blocks

against the plaintiff.³ Rico Williams' list of blocks includes ten names, along with the dates each block was entered.⁴ Nine of the officials who blocked sub-varsity basketball assignments with the plaintiff entered their blocks in 2014 or 2015, and one official entered a block on January 20, 2016. Additionally, two schools were listed as blocked from assignments with the plaintiff on the SCHSL list. The schools' blocks were entered by a member of the SCHSL staff on November 6, 2013. Therefore, the defendants have provided evidence that the statement regarding blocks in the February 5th email was true.

To date, the plaintiff's only rebuttal to this supporting documentation provided by the defendants has been to claim that the records have been falsified. In some instances, her claim is based on a misunderstanding of the documents. For example, in one Memorandum, the plaintiff questioned the validity of the SCHSL's list of blocks because seven of the officials were not members of the SCBOA. In its letter serving the discovery subject to the Protective Order, the undersigned counsel explained that the SCHSL list contained blocks by officials in all varsity sports. Thus, any official who had blocked her for varsity softball, volleyball, football, lacrosse, and even basketball would show up on that list. Regardless of plaintiff's inability to accept the documentation as valid, she has not provided any evidence that questions the authenticity of these documents. Therefore, the defense of truth has been established.

³ The lists are not identical due to the fact that the SCHSL would have only had access to officials' blocks against the plaintiff in all varsity sports, while local district officials would have access to officials' blocks against the plaintiff in sub-varsity sports. This is further explained in the filed Affidavit of Skip Lax.

⁴ In light of the Protective Order, the defendant will bring a copy of these documents for the judge's *in camera* review.

B. Ratings of Officials Who Blocked Plaintiff

The SCHSL publishes ratings of basketball officials every year, and the formula for the rating is found in the SCBOA bylaws. The SCHSL has produced in this case the complete set of ratings for the years 2013-2016. For every official identified by Arbiter as having blocked the plaintiff at the sub-varsity basketball level, their respective ratings are higher than the plaintiff's rating. This fact does not appear to be disputed by the plaintiff.

C. Plaintiff's Failure to Attend Meetings

In support of the statements in his February 5th email regarding plaintiff's meeting deficiencies, Rico Williams produced documents created by the Secretary/Treasurer of District One, Kevin Brown. (Exhibit G). This chart, as well as comments taken from Mr. Brown's attendance spreadsheet, verify the information in the February 5th email about the plaintiff's attendance at meetings, along with other officials who may have left early or arrived late. Thus, the defense of truth has been established. Much of plaintiff's response to this issue has been to claim that meeting attendance had never been an issue before Rico Williams included it in this email. While this is irrelevant to the defense of truth, it should be noted that 2015-2016 was Rico Williams' first year as District One director, and he previously emailed Ms. Richburg and others in October 2015 about missed meetings.

Based on the foregoing arguments, the statements in Rico Williams' February 5th email have been shown to be true. The fact that plaintiff simply rejects or misunderstands the evidence presented by the defendants is not sufficient grounds to defeat summary judgment. See Shupe v. Settle, 315 S.C. 510, 516-17, 445 S.E.2d 651 (Ct. App. 1994) ("A conclusory statement as to the ultimate issue in a case is not sufficient to create a genuine issue of fact for purposes of resisting summary judgment."); Felty v. Graves-Humphreys

Co., 818 F.2d 1126 (4th Cir. 1987) ("Unsupported speculation is not sufficient to defeat a summary judgment motion.").

III. Mr. Williams' statements were protected by a qualified privilege

Even if the Court was hesitant to grant summary judgment based on the defense of truth, the plaintiff's claims should be dismissed against both defendants because they are entitled to a qualified privilege as a matter of law.

In a defamation action, a defendant may assert the affirmative defense of qualified privilege. Murray, 344 S.C. at 139, 542 S.E.2d at 748. "Where the occasion gives rise to a qualified privilege, there is a prima facie presumption to rebut the inference of malice, and the burden is on the plaintiff to show actual malice or that the scope of the privilege has been exceeded." Swinton Creek Nursery v. Edisto Farm Credit, ACA, 334 S.C. 469, 485, 514 S.E.2d 126, 134 (1999). Additionally, although the plaintiff was not an employee, our courts have held that a statement made in connection with an employer's bona fide inquiry into possible employee misconduct is qualifiedly privileged. Wright v. Sparrow, 298 S.C. 469, 474, 381 S.E.2d 503, 507 (Ct. App. 1989).

The threshold issue is whether a qualified privilege exists between the SCHSL and the SCBOA. In general, the question of whether an occasion gives rise to a qualified privilege is a matter of law for the court. Murray, 344 S.C. at 140, 542 S.E.2d at 749. "A communication made in good faith on any subject matter in which the person communicating has an interest or duty is qualifiedly privileged if made to a person with a corresponding interest or duty even though it contains matter which, without this privilege, would be actionable." Id. (citing Constant v. Spartanburg Steel Prods., Inc., 316 S.C. 86, 447 S.E.2d 194 (1994)).

Clearly, there is a common interest for both the SCHSL and the SCBOA regarding the dispute that arose between the plaintiff and Rico Williams. The SCBOA operates to provide basketball officials for SCHSL contests, and Skip Lax serves as both the Associate Commissioner of the SCHSL and the Commissioner of Officials with outlined responsibilities under the SCBOA bylaws. As previously stated, before being allowed to officiate a basketball contest, the plaintiff had to sign a District One SCBOA Contract and an SCHSL code of ethics. Given the relationship between the two organizations and their overlapping responsibility with basketball officials, a qualified privilege existed between the SCHSL and the SCBOA with respect to this situation involving Ms. Richburg. Additionally, the plaintiff herself threatened to report these issues with Rico Williams to the SCHSL in her text message to him *before* the February 5th email.

An abuse of a qualified privilege occurs when (a) a statement is made in good faith that goes beyond the scope of what is reasonable under the duties and interests involved; or (b) a statement is made with actual malice. Fountain v. First Reliance Bank, 398 S.C. 434, 730 S.E.2d 305 (2012); Murray, supra (in defamation action, if defendant proves qualified privilege, plaintiff may not recover unless he overcomes privilege by proving actual malice) (citing Bell v. Bank of Abbeville, 208 S.C. 490, 38 S.E.2d 641 (1946)). In the absence of a controversy as to the relevant facts, it is for the court to say whether the privilege has been abused or exceeded. *Id.*

In this case, the defendants have not abused their qualified privilege. First, Rico Williams did not exceed the scope of the privilege because he only sent a copy of the February 5th email to the Board of Directors and to the Commissioner of Officials. Secondly, there is no evidence that Rico Williams acted with malice. To begin with, it

should be noted that, under the District One SCBOA Contract, Rico Williams, as the Director, had the authority to reject any future renewal applications. However, instead of unilaterally deciding the repercussions of the plaintiff's actions, Rico Williams submitted the matter to the Board of Directors. *See Williams Affidavit*, ¶ 31.

Additionally, there was no history of animosity between Rico Williams and the plaintiff. Before February 2016, Rico Williams often communicated with the plaintiff about non-SCHSL officiating opportunities. Additionally, according to the plaintiff, Rico Williams previously asked her to participate on a committee for District One, which the plaintiff declined due to time constraints. (Richburg Depo., pp. 61-62, ll. 15-25, 1-3; Ex. C). The plaintiff further testified that she never had any problems with Rico Williams before February 2, 2016. (Richburg Depo., p. 50, ll. 23-25; pp. 51-53, ll. 1-22; Ex. C). Thus, there is no motive for Rico Williams to act towards the plaintiff with malice of any kind.

Simply put, given that a qualified privilege exists with respect to the allegedly defamatory February 5th email, the plaintiff must come forward with some evidence that Rico Williams acted with actual malice in his communications. For the reasons set forth in the analysis regarding the defense of truth, it is clear that the information discussed by Rico Williams was not done with any malice. Therefore, plaintiff's case must be dismissed.

IV. The SCHSL was not negligent by "failing to intervene."

Although it is somewhat clear as to the basis of any claim by the plaintiff other than defamation, she has asserted in recent court filings that her claim against the SCHSL is based on the fact that Commissioner Lax was negligent by failing to properly investigate

the actions of Rico Williams. At the outset, and as stated previously in this Memorandum, the information set forth in the February 5th email was true. Additionally, the only immediate consequence of the February 5th email from Rico Williams to the plaintiff was that she would be given no further assignments until the District One Board of Directors could meet to discuss her membership status. Therefore, the dispute between the plaintiff and Rico Williams was going to be further investigated or discussed by the District One Board of Directors from the outset.

Furthermore, Commissioner Lax did not "fail to intervene" in the strict sense of the term; rather, the plaintiff is upset that Commissioner Lax deferred the dispute to be addressed at the district level. The same is true with Mr. Moots. The plaintiff asked for Mr. Moots' advice, but she did not like the advice she received. That is certainly not grounds for a negligence claim.

To prevail on a theory of negligence, the plaintiff must provide evidence of three essential elements: (1) a duty of care owed by the defendant to the plaintiff; (2) a breach of that duty by a negligent act or omission; and (3) damages proximately caused by a breach of duty." Vinson v. Hartley, 324 S.C. 389, 477 S.E.2d 715 (Ct. App. 1996). None of these elements have been met in this case. First, there is no duty owed by the SCHSL to a basketball official, who is an independent contractor, to intervene when there is a dispute at the district level. In other words, the District One SCBOA Contract sets forth certain expectations between the members of District One and the district's leadership, and the plaintiff can point to no document, bylaw, etc., that required the SCHSL to unilaterally adjudicate the dispute.

To the extent the plaintiff argues that the SCHSL's duty to intervene is based on some provision of the SCHSL or SCBOA's bylaws, it should be noted that the SCHSL is a governmental entity subject to the South Carolina Tort Claims Act. As such, South Carolina Code section 15-78-60(4) provides that an entity cannot be held liable for loss resulting from the "adoption, enforcement, or compliance with any law or failure to adopt or enforce any law, whether valid or invalid, including, but not limited to, any charter, provision, ordinance, resolution, rule, regulation, or written policies." Therefore, there is no actionable basis for a common-law or contractual duty owed by the SCHSL to the plaintiff with regard to adjudication of disputes.

As to the second element of negligence, there is no evidence that the SCHSL breached any duty to the plaintiff by acting unreasonably in responding to the plaintiff's situation. Commissioner Lax did not make any decisions in favor of or against either the plaintiff or Rico Williams, and he simply assessed the dispute as a local matter. Commissioner Lax's conduct did not make it more or less likely that the District One Board of Directors would make the decision they ultimately reached on February 29, 2016. Accordingly, the plaintiff also cannot prove the third element of negligence.

For the reasons stated above, the plaintiff has not set forth any evidence sufficient to charge the SCHSL with negligence, and therefore, the SCHSL is entitled to judgment as a matter of law.

PLAINTIFF'S MOTION TO COMPEL

The defendant, SCHSL, joins and incorporates by reference the arguments set forth in Rico Williams' Memorandum in Opposition to Plaintiff's Motion to Compel. Both defendants have provided numerous documents to plaintiff to substantiate the defenses

raised in this case. It appears that a pattern has emerged where the plaintiff receives discovery responses and documents, and based on her interpretation of the documents, she argues that more documents should exist and should be provided. This is simply not the case.

Counsel for the SCHSL wrote the plaintiff in a letter dated March 14, 2017, in an attempt to truly narrow down what documents she claimed she was missing in response to her prior discovery requests. The SCHSL respectfully submits that certain discovery requests seek information that is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. For example, the plaintiff has asked for the number of blocks against every official in District One, which has no bearing as to the truth of Rico Williams' statement in his February 5th email concerning the number of official's blocks against the plaintiff. Therefore, the SCHSL believes the summary judgment motions are ripe for adjudication.

CONCLUSION

For the reasons set forth herein, the defendant, South Carolina High School League, respectfully requests that the Court grant its Motion for Summary Judgment.

(Signature page to follow.)

Respectfully submitted,

SOWELL GRAY ROBINSON STEPP &
LAFFITE, L.L.C.

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Attorneys for Defendant, South Carolina High
School League

Columbia, South Carolina

March 16, 2017

(SCHSL) Exhibits A-G to South Carolina High School League's Memorandum in opposition to Plaintiffs Motion to Compel and in Support of its Motion for Summary Judgment

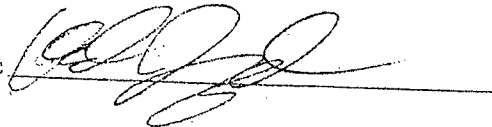
SCBOA District 1 Contract

The intent of this contract is to serve as an informational document in order to enhance communication procedures as much as it is to be a guideline for professional conduct for the officials of the District 1 South Carolina Basketball Officials Association.

FAILURE TO RETURN A SIGNED CONTRACT WILL RESULT IN FAILURE TO RECEIVE A SCHEDULE.

1. I agree to return all communications to the director, assistant director, secretary/treasurer, and assignor promptly regardless of the time of the year. I understand that the failure to return communications in a timely fashion can result in the loss of cooperation points.
2. I agree to keep all contact information current with the District 1 director and secretary at all times of the year.
3. I agree to return all forms to the appropriate person by the imposed deadlines. I understand that I will not receive a schedule if I fail to turn in a physical form and markoff form by the deadlines.
4. I agree to pay all required dues by the deadlines. I understand that I will not receive a schedule if I fail to pay dues.
5. I agree to pay all fines imposed due to failure to meet deadlines or follow proper procedures. I understand that I will not receive a schedule if I fail to pay the imposed fine(s).
6. I understand that I must meet all required state and district meetings and that failure to meet the requirements can result in the loss of cooperation points.
7. I understand that as a member of District 1 I represent all officials of District 1 and of the South Carolina Basketball Officials Association. I will conduct myself in a professional and ethical manner at any basketball event whether or not I am a spectator or working the game.
8. I understand that the District 1 director has the authority to enforce professional standards and to accept or reject my transfer to another district or readmittance to the SCBOA.
9. I understand that I may be put on probation, and/or suspended, or dismissed if I fail to conduct myself in a professional manner as a District 1 basketball official and if I fail to follow District 1 guidelines as listed in this contract.
10. I understand that I must communicate in writing to the District 1 director if I chose to take a leave of absence for a season for which I have previously registered.
11. I understand that it is proper procedure to contact the District 1 director before communicating with the SCHSL office regarding SCBOA concerns.
12. I agree to keep my markoff lists updated frequently and to pay a fine if I am contacted for an assignment and I am not available.
13. I agree to notify the District 1 director, the assignor, and the SC High School League IMMEDIATELY if I am unable to make an assigned game. I understand that sending an email or leaving a voice message does not relieve me of this requirement until I receive a personal response from the director or assignor. OUTSIDE the 14 day window - by email/phone; WITHIN the 14 day window - by email/phone; WITHIN 48 hours of game time - ONLY by phone.
14. I agree that I will NOT get my own replacement if I cannot make it to my assignment.
15. I agree that I will NOT swap assignments unless directed to do so by the District 1 director or assignor.
16. I agree to report to my District 1 sub-varsity assignments by a minimum of 30 minutes prior to game time and be on the court for duty 15 minutes prior to tip-off. I agree to contact the District 1 director if I fail to be at the game site on time.
17. I agree to contact the District 1 director and assignor if my partner(s) are late for assignments and to contact my partner(s) by phone if I incur problems in route to the game site that will cause me to be late for my assignment.
18. I agree to report to the District 1 director if a different crew member listed from the original crew works any assignment and I have not had prior notification from the District 1 director, assignor or the SCHSL.
19. I agree that the referee of the crew has the responsibility to contact the crew a minimum of 24 hours prior to game time. However, the umpire(s) should initiate contact within the 24 hour period to all crew and to the District 1 assignor if the referee has failed to fulfill his/her responsibility.
20. I agree to report in the District 1 assignor (locally booked varsity games and sub-varsity games) and director if my partner fails to communicate with me 24 hours prior to game time.
21. I agree that I reside in the District 1 area or that I have received permission from the appropriate district director to work in District 1.
22. I agree that I will not ask for payment of the game fee at the game site. I understand to contact the District 1 assignor and director if I fail to receive my game fee in a timely fashion.
23. I agree to inform the District 1 director of any problems involved with my assignments that could result in communication from the schools to the District 1 director. I understand that the failure to report can result in disciplinary procedures.
24. I agree that I will not use the District 1 membership for solicitation purposes.
25. I agree to honor my assigned commitments to work SCHSL basketball games both during the regular or off-season as assigned by the SCHSL or SCBOA District 1 Assignor. I understand that should I officiate games for sanctioned SCHSL teams at any sanctioned SCHSL high school within the District #1 boundaries for assignors other than those previously mentioned, either during the regular or off season, I will be subject to disciplinary actions such as probation, suspension, and/or dismissal as determined by the SCBOA District #1 Director.

SIGNATURE



DATE 10-26-15

WILLIAMS
90001

Exhibit A

ELECTRONICALLY FILED - 2017 Mar 16 6:38 PM - GREENVILLE - COMMON PLEAS - CASE#2016CP2302113

1/11/2017

Gmail - Fw: Information for Official

acknowledging the assignment then Rico Williams stated that someone told him that I had on sweat pants for a previously assigned game with the SCHL. I told Mr. Williams that I do not wear or own sweat pants is that all. My statement was not disrespectful and my text only communicated my position on how Mr. Williams began the conversation by discussing his personal officials assigning business and followed up with disrespect and harassment by asking me if I wore sweat pants to a previous SCHL game. It is evident that I have done nothing wrong and my officiating skills, officiating dress and level of professionalism were not a problem until I communicated my disdain to Rico Williams. At this point, I only sought unbiased representation from my Officials Representative, unfortunately the officials representative responded like a District Director's representative. Please communicate my position as a District One Basketball Official for District One for 2016-2017. Mr. Williams stated that I was not in compliance for some reason after my recent text communication, I did not receive any communication before the 2015-2016 Basketball Season began that I was not in compliance. Mr. Moots, I want you to know that I am a professional at all times all communications are considered business on my behalf nothing is personal.

Aminah Richburg
District One Basketball Official

[Quoted text hidden]

Joedy Moots <jmoots@grayca.com>
To: aminah richburg <richburga@bellsouth.net>

Tue, Feb 23, 2016 at 5:37 PM

Aminah,

You are correct, I only went on what was said in the emails and text. I didn't mean you were insubordinate but that if one of my staff talked to me like that, I would consider it insubordination. Believe me, the basketball directors and I have gotten into many disagreements because I am always taking up for my officials. But you can't win an argument with your director because they have too much power within the organization. You have to find a way to get along. Like I said, I have no knowledge of your officiating ability. I can definitely see there is a personality conflict and the best thing you can do is go to a different district. If I were you, in a respectful way, I would ask him to elaborate on his accusations about schools and officials marking you off. You seem like an extremely intelligent young lady and I hope you stick with officiating because we need more females in sports. I really can't help you with Rico. But if there is anything I can do for you, I would gladly help. I am hoping I get assigned the upper state finals this weekend. If I do, I will be at all games. I will be in the officials suite. I would love to sit down and talk to you.

Joedy

[Quoted text hidden]

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Joedy Moots <jmoots@grayca.com>

Wed, Feb 24, 2016 at 1:55 PM

I appreciate your honesty, I will not seek officiating opportunities in a different district because I work and live in the Greenville area and the distance required to officiate in nearby counties will be burdensome. I will pay my registration for District One as I have for the past three years. Rico is an ignorant man and he displayed his lack of professionalism and leadership ability as the District One Director.

Aminah Richburg

[Quoted text hidden]

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1/11/2017

Gmail - Fw: Information for Official

you never know when you will need to cross one to advance or continue growing.

Best of luck in all you do!

Joedy

[Quoted text hidden]

Joedy Moots
Principal
Gray Collegiate Academy
803-951-3321



"Give a man a fish and you feed him for a day; teach a man to fish and you feed him for a lifetime."
Maimonides

aminah richburg <richburga@bellsouth.net>
Reply-To: aminah richburg <richburga@bellsouth.net>
To: Joedy Moots <jmoots@grayca.com>

Tue, Feb 23, 2016 at 5:05 PM

Mr. Moots, I am disappointed with your response and I believe that your response is prejudiced on Mr. Williams behalf. I have not communicated with anyone except Mr. Williams. It was Rico Williams that sent all written communications, I merely forwarded the communications to you. I have a right as a human being to communicate to anyone when I have been harassed. Mr. Williams asked if I wore sweat pants and I communicated to him that I do not wear or own sweat pants is that all. I am always dressed professionally and clean according to the SCHL officials dress code requirement. Unfortunately, Mr. Williams has contracted numerous recreation organizations that require sports officials in the Greenville area where I reside and his position I felt was a conflict of interest with his position with the South Carolina High School League whereas he is able to control officiating opportunities and further use his position of power. I have not had any problems with any officials when I have been assigned games and I have not had any problems at any schools. My assignments have not changed at all and I have officiated games at the same schools for the past three years. The only blocks that I am aware of are blocks I have created in the system. Mr. Williams is not attempting to help me at all, in fact his behavior and communications have been destructive. If there was a problem, it was never communicated and as I stated before, my assignments have not changed in the past three years. I have officiated games in the same schools with the same officials every year. Changing officiating districts will create a personal burden for me. I am a professional and I get along with all officials I work with and administrators. Again Mr. Moots, I am disappointed with your response which is personal and biased on behalf of Mr. Williams. I am quite sure that if you take time and review all of the documentation presented on my behalf as my Officials Representative and also take time to review my assigned games for the past three years, you will see that Mr. Williams responded to insubordination on my part is unfounded and unmerited. I only sent one text message to Rico Williams communicating my response to his previous cellular phone call, which I have a right to do as a human being. Mr. Williams began the conversation with communicating with me that I will be assigned to officiate games at Furman University and I responded that I sent him a text earlier

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ELECTRONICALLY FILED - 2017 Mar 16 5:38 PM - GREENVILLE - COMMON PLEAS - CASE#2016CP2302113

E.A."Rico"Williams
Director, District 1
SC Basketball Officials Association
(864 430-9884
Ericowms@charter.net

Tue, Feb 16, 2016 at 11:51 AM

Mon, Feb 22, 2016 at 9:21 AM

I have read the corresponding email from your Director, Rico Williams. I have also reviewed your text to Mr. Williams as well. I have always had respect for our states district directors and the high school league office. Being the officials representative the past four years has been very rewarding to me, but has opened my eyes with even more respect and admiration for both the league and directors. In my real line of work, I am a high school principal and have been in administration for over 20 years. In a way, that is what a director is. The officials in their district are their staff and they are responsible for them. Always dress professional with a clean uniform because you are not only representing yourself, but your district and state as well. I am going to say some things that you are probably not going to like, but if you ask anyone about me, I will always be brutally honest.

As far as Mr. Williams, he is one of the most respected officials and directors in the state. I have never known him as being anything but sincere, honest and professional. I have had disagreements with him myself, but in all my dealings with him, he was professional and respectful. In reading the correspondence from him to you, I feel all his responses were merited. It seems you are having trouble with fellow officials and other schools. It looks to me that Mr. Williams has gone the extra mile to help you advance in your officiating career.

As an administrator, if one of my employees talked about me like you did about Mr. Williams, they would be put on leave for insubordination. I have never seen you work so I cannot comment on your officiating ability but I do want to give you some advice. None of us are in this for the money, we are in it for the love of sport and the love of kids. The game is bigger than us and once we are gone, the game will go on. Get along with your peers and administrators. Be an official that everyone wants to work with and have you on their games. There will always be officials and coaches you don't necessarily like, but they should never know it.

I also agree with Mr. Williams that if you are still serious about officiating, you should try another district, especially after your accusations about your director. Be careful not to burn many bridges in your journey through officiating and life,

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Gmail - Fw: Information for Official

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me. On Wednesday Feb 3, I left the same message as well as a text. After you subsequently called me back I mentioned to you that the games I scheduled for you to work Thursday, Feb. 4 at Furman's Intramural Program were indeed still on, and I informed you that someone at your last game at Beck Middle School on Feb. 2 had told me that you were officiating with "jogging/workout" type pants that were very tight. If you remember, last year during the JV tournament I asked you to wear your official's pants instead of those "jogging" pants whenever you're representing District One and you said you would. When I asked you was that report accurate from Monday you replied, "I don't wear jogging pants. Is that all?" I then asked you if it was problematic for you with me asking that question and your response was, "I don't wear jogging pants. I'm at work. Is that all?" I then stated that we talk again soon.

Even though your responses were short, terse and rude I was going to let the matter rest for another day; until after a few minutes you sent me a lengthy text which follows, and I quote: " Please discontinue the harrasing communications. Previous District One leaders presented a higher level of professionalism which made officiating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL".

I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked of by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept. 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 1/2 meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1

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CODE OF ETHICS

1. This Code of Ethics for athletic officials has been developed to protect and promote the best interest of interscholastic athletics and the officiating profession. Its primary purpose is to clarify and distinguish ethical and approved professional practices from those that are detrimental and harmful.
2. I will study the rules, observe the work of other officials, and will, at all times, attempt to improve myself.
3. I will endeavor to keep my body in sound physical condition. I will have regular physical examinations to assure myself and my associates of my physical capabilities.
4. I will remember that while my work as an official is important, I must conduct myself in such a way that attention is drawn, not to me, but to the boys and girls playing the game. I will keep in mind that the game is more important than the wishes of any individual player or the ambitions of any individual official.
5. I will dress and maintain my appearance in a manner befitting the dignity and importance of my profession.
6. I will shape my character and conduct so as to be a worthy example to the boys and girls who play under my jurisdiction.
7. I will be fair and unbiased in my decision, rendering them without regard to the score.
8. I will give my complete cooperation to the schools, which I serve, the officials' association of which I am a member and to the South Carolina High School League.
9. I will cooperate with my fellow officials and will do nothing to cause them public embarrassment.
10. I will, in my actions on the floor or field, be firm but not overbearing; courteous, but not ingratiating; positive, but never rude; dignified, but never "cocky"; friendly, but not companionable; calm, but always alert.
11. I will not officiate a game after having any alcoholic drink that day.
12. I will not approach coaches or athletic directors, personally or by mail, relative to assignments or rulings.
13. I will not make a request to officiate a specific game or games for any coach, school or conference.
14. I will not criticize or attempt to explain a fellow officials' judgment or decision.
15. I will honor all contracts in spite of possible inconvenience or financial loss.

As an approved South Carolina High School League official, it is hereby agreed, stipulated and understood that my employment as a high school league official is that of an independent contractor and not as an employee of the South Carolina Basketball Officials Association, South Carolina High School League or of the school districts or high schools competing in an interscholastic athletic competition event.

It is further stipulated and agreed that the consideration for each game officiated will be negotiated by a contract price for officiating a single contest according to the applicable rules governing the inter-scholastic competition for which I have agreed to officiate. I understand that the contract price for officiating each contest will vary from contest to contest and sport to sport.

I hereby agree to officiate the interscholastic competition according to the applicable federation rulebook, as well as any appropriate state adoptions.

I hereby release the South Carolina High School League, the South Carolina Basketball Officials Association and the out-of-state school districts from all claims which I might have, except for this release, have or hereafter may have, and from any liability whether imposed by common law or statute or under the South Carolina laws of workers' compensation on account of any accident which may occur and/or injury which I may sustain in the course of carrying out my responsibilities as stated above.

It is further agreed that I am assuming all the risks of this undertaking and that I am acting as an independent contractor.

It is further stipulated and agreed that my compensation is based upon a lump sum fee for a single competitive event and that no withholdings of these funds are made by the payer.

I understand and agree that either school retains the authority not to employ my services.

I understand and agree that the booking office will make my assignments according to the rules pertaining to booking officials. Releases and restrictions to be observed in booking my schedule for the season will be sent to the booking office. Subject to these releases and restrictions, the booking office is empowered to accept and assign assignments for the open dates on my schedule. I agree to uphold and observe the constitution, by-laws and booking regulations of the South Carolina Basketball Officials Association.

I believe that interscholastic athletics is an integral part of our secondary school program and that good officiating promotes enjoyment of these athletic contests as well as protection to the participants. Because I want to render a service to the youth of South Carolina and progressively improve and elevate officiating standards in South Carolina, in signing this application I agree to abide by the above standards and Code of Ethics.

Date 3/16/14

Signature _____

ALL APPLICATIONS MUST BE SUBMITTED TO THE BOOKING OFFICE

WILLIAMS
06002

Exhibit B

1 A. Right.

2 Q. -- is it your testimony that I am --
3 one -- I am sure he didn't -- this incident didn't
4 happen last year at a JV tournament, or I don't
5 remember anything, I can't dispute that he said
6 something to me or not?

7 A. You know, I don't know. I can't
8 recall at this time.

9 Q. Okay. Okay. And then the next
10 paragraph on Exhibit 2 is where Rico quotes a text
11 that he received from you shortly after that phone
12 conversation. Do you see that?

13 A. Yes.

14 Q. Did he accurately, to your knowledge,
15 quote that text message?

16 A. I don't know. I don't have that text
17 message.

18 Q. Okay. Let me ask it this way: Do you
19 have any reason to believe that Rico changed your
20 text message in this email?

21 A. It's a possibility.

22 Q. Okay. You don't have a text -- you
23 don't have the original text message to be able to
24 show that either way?

25 A. No.

A W R

A. WILLIAM ROBERTS, JR., & ASSOCIATES (800) 743-DEPO
scheduledepo.com

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Exhibit C

12:57:01
12:57:01
12:57:04
12:57:09
12:58:02
12:58:05
12:58:06
12:58:08
12:58:09
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12:58:49
12:58:52
12:58:55
12:58:57
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12:59:01
12:59:04
12:59:05

1 equipment, then that person would cover that part of⁶¹
2 the rule.

3 Q. Right. Okay. And did you ever lead
4 discussions or lead -- go over rules in those
5 meetings?

6 A. I don't have the experience to do
7 that.

8 Q. Got you.
9 And I take it Ms. Norris or
10 Mr. Williams never asked you to?

11 A. Ms. Norris with coming in the first
12 year you don't know everything, so of course the
13 second year is like the same thing --

14 Q. Right.

15 A. -- you know. So going into the third
16 year, Mr. Williams did give me a call and ask me if
17 I would serve on some type of committee. And I just
18 told him that at the time I was officiating football
19 and volleyball and could not commit that time to
20 participate on that committee.

21 Q. And I take it that would have been --

22 A. To me that's like an affirmation to
23 say that, you know, I see you up and coming, you
24 know, you're a strong official and that, you know,
25 to even consider that. I didn't ask him. He asked

A W R

A. WILLIAM ROBERTS, JR., & ASSOCIATES (800) 743-DEPO
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62

12:17:17
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12:17:48
12:17:50
12:17:57
12:18:00
12:18:03
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12:18:26
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12:18:39
12:18:42
12:18:46
12:18:50

23 A. There's not a venue for it. When the
24 high school league representative comes, you have
25 everyone, not only in District 1 but possibly

1 that prohibited you taking these assignments from
2 Rico due to your status as a District 1 BOA member?
3 A. I don't know.
4 Q. To your knowledge, there wasn't some
5 rule that prevented you from taking those contests?
6 A. I don't know.
7 Q. Okay. No one ever told you you
8 couldn't?
9 A. I don't recall either way. I don't
10 know.
11 Q. Okay. And are you aware of any rule
12 that prevented Mr. Williams from helping these
13 groups find officials?
14 A. You said if there are any rules for
15 Mr. Williams to find officials for these people?
16 Q. I said, are you aware of any rules
17 preventing Mr. Williams from finding officials for
18 these groups?
19 A. I don't know --
20 Q. Okay.
21 A. -- of anything.
22 Q. Okay. All right.
23 Before this incident came up in
24 February of 2016, had you ever had any problems with
25 Mr. Williams?

1 A. Prior to -- prior to February the 2nd?
2 Q. Yes, ma'am.
3 A. Okay. Yes.
4 Q. Okay. Tell me what problems you had
5 with Mr. Williams or vice versa.
6 A. You know what, it wasn't a problem
7 when I think about it. So I would say, no problems.
8 Q. Okay. Tell me what issues -- I
9 understand it wasn't a problem; but tell me what
10 sort of -- maybe disagreement might be too strong a
11 word, but tell me anything out of the ordinary that
12 had come up between you and Mr. Williams before
13 February 2nd, 2016?
14 A. Let's see. There was an incident
15 where Mr. Williams gave me a call, and the call was
16 referring to a game I had with Mr. John Williams.
17 Mr. Williams left -- he left an email message on my
18 personal email about an upcoming game. And my
19 experience with all officials, we always communicate
20 by phone. So Mr. Williams communicated to Mr. --
21 well, both of them had -- yeah. Both of them had
22 the same last name. John Williams communicated to
23 Rico Williams that he had not received a response
24 from me. So Mr. Williams, Rico Williams, called me
25 to communicate that John Williams had called him to

A W R

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ELECTRONICALLY FILED: 2017 MAR 16 6:58 PM - GREENVILLE, COMMON PLAINS, CLAS#2017-002190

A. WILLIAM ROBERTS, JR., & ASSOCIATES (800) 743-DEPO
scheduledepo.com

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12:06:33	CADY
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12:07:59	GREENVILLE
12:07:59	COMMON PLEAS
12:07:59	CASE
12:07:59	2018CP2021
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12:07:55

A. WILLIAM ROBERTS, JR., & ASSOCIATES (800) 743-DEPO
scheduledepo.com

Page 53

Zimbra

skip@schsl.org

Fw: Information for Official

From : aminah richburg <richburga@bellsouth.net>

Tue, Feb 09, 2016 04:43 PM

Subject : Fw: Information for Official

To : skip@schsl.org

Reply To : aminah richburg <richburga@bellsouth.net>

Mr. Lax, I am forwarding this email message sent by Rico Williams which I believe is highly inappropriate for a District One Director. Mr. Williams did not initiate the call because of a High School League Game, he called to confirm games assigned at Furman University through his business. I confirmed the assigned games through a text message initiated by Mr. Williams the previous week. When I returned Mr. Williams phone call, he stated that the games were still on and I responded ok about the games, then Mr. Williams communicated that someone at my previous game told him I had on sweat pants, then he asked if I wore sweat pants and I told him, "I do not wear sweat pants, is that all? Then Mr. Williams asked the question, if I had a problem discussing my sweat pants and I repeated, "I do not wear sweat pants, is that all, because I am at work and I need to get off the phone. Mr. Williams responded fine and the conversation ended. Unfortunately the details of our conversation changed with Mr. Williams interpretation in the email he sent to you and several others. I communicated my concerns with a text message to Mr. Williams later because he harassed me and I was obligated to let him know. I now feel that I am being harassed, embarrassed and bullied by Mr. Williams and the email communication he has sent to various individuals proves his lack of professionalism. My meeting attendance has never been a problem with prior leadership or with the current leadership until now. It is true that I attended three meetings this year, I planned to make the fourth meeting, unfortunately, Mr. Williams changed the meeting date and I had a conflict. I met all requirements to officiate basketball games for the SCHL by attending all required meetings. Mr. Williams has shared a lot a damaging information that I did not know concerning my colleagues that have communicated that they did not want to work with me and blocked schools. I know that I blocked CCES and Hillcrest Middle School myself due to personal reasons. If there were any schools that blocked my assignment other than the schools I blocked, I was scheduled that the same schools this year along with some of the same officials. I would like to know the officials that blocked me, it would help me in the future if those same officials officiate other sports. Mr. Williams has his circle of supporters that he has put in leadership positions and many of those individuals character are similar to his. I am an educated professional and sometimes my demeanor may dash with individuals whose behavior is unprofessional and uncouth. Mr. Williams has no legitimate reason to discuss or set parameters towards my participation with the SCHL or District One Board with my continued participation as a basketball official. Furthermore, I would like Mr. Williams to present a detailed list of arrival times for all District One officials for all meetings. I have done nothing out of character. I would like a written apology from Mr. Williams for his lack of professionalism and the pain and suffering he has caused me.

Aminah A. Richburg

On Friday, February 5, 2016 12:49 PM, "ericowms@charter.net" <ericowms@charter.net> wrote:

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me. On Wednesday Feb 3, I left the same message as well as a text. After you subsequently called me back I mentioned to you that the games I scheduled for you to work Thursday, Feb. 4 at Furman's Intramural Program were indeed still on, and I informed you that someone at your last game at Beck Middle School on Feb. 2 had told me that you were officiating with "jogging/workout" type pants that were very tight. If you remember, last year during the JV tournament I asked you to wear your official's pants instead of those "jogging" pants whenever you're representing District One and you said you would. When I asked you was that report accurate from Monday you replied, "I don't wear jogging pants. Is that

1 of 2

Exhibit E

 5346/1536
 Produced by SCHSL
 014

Gmail - Fw: Information for Officials

ELECTRONICALLY FILED - 2017 Mar 15 0:39 PM - GREENVILLE - COMMON PLEAS - CASE#2016CP238213

E.A."Rico"Williams
Director, District 1
SC Basketball Officials Association
(864 430-9884
Ericowms@charter.net

Wed, Feb 10, 2016 at 9:45 AM

Aminah, We do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level.- Sincerely,Skip

[Quoted text hidden]

Thu, Feb 11, 2016 at 1:36 PM

[Quoted text hidden]

Tue, Feb 16, 2016 at 10:49 AM

richburga@bellsouth.net

On Friday, February 5, 2016 12:49 PM, "ericowms@charter.net" <ericowms@charter.net> wrote:

Exhibit F

<https://mail.google.com/mail/u/0/?ui=2&ik=6c233b5a51&view=pt&search=sur&th=15310480565b14c8&siml=152c7fd06719abbe2&siml=152cbe4ff78b5c08&siml...> 3/7

all?" I then asked you if it was problematic for you with me asking that question and your response was, "I don't wear jogging pants. I'm at work... Is that all?" I then stated that we talk again soon.

Even though your responses were short, terse and rude I was going to let the matter rest for another day; until after a few minutes you sent me a lengthy text which follows, and I quote: " Please discontinue the harrasing communications. Previous District One leaders presented a higher level of professionalism which made offkating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL."

I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked of by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept. 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 1/2 meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1 member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc. It is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facilitate the communication to any District in South Carolina that you choose if that is the route that you deem favorable.

Regards,

E.A. "Rico" Williams
Director, District 1
SC Basketball Officials Association
(864) 430-9884
Ericowms@charter.net

Zimbra

skip@schsl.org

Re: Information for Official

From : aminah richburg <richburga@bellsouth.net>

Thu, Feb 11, 2016 01:36 PM

Subject : Re: Information for Official

To : Skip Lax <skip@schsl.org>

Reply To : aminah richburg <richburga@bellsouth.net>

I do not believe my concerns are a district matter and I will hire an attorney to seek relief for my pain and suffering on this matter and communicate the lack of support I am receiving from leadership at the SCHL.

Aminah Richburg

On Wednesday, February 10, 2016 9:44 AM, Skip Lax <skip@schsl.org> wrote:

Aminah, We do not share with any officials blocks by schools or their peers. Your concerns are a local matter to be handled at your district level. Sincerely, Skip

From: "aminah richburg" <richburga@bellsouth.net>

To: skip@schsl.org

Sent: Tuesday, February 9, 2016 4:43:15 PM

Subject: Fw: Information for Official

Mr. Lax, I am forwarding this email message sent by Rico Williams which I believe is highly inappropriate for a District One Director. Mr. Williams did not initiate the call because of a High School League Game, he called to confirm games assigned at Furman University through his business. I confirmed the assigned games through a text message initiated by Mr. Williams the previous week. When I returned Mr. Williams phone call, he stated that the games were still on and I responded ok about the games, then Mr. Williams communicated that someone at my previous game told him I had on sweat pants, then he asked if I wore sweat pants and I told him, "I do not wear sweat pants, is that all? Then Mr. Williams asked the question, if I had a problem discussing my sweat pants and I repeated, "I do not wear sweat pants, is that all, because I am at work and I need to get off the phone. Mr. Williams responded fine and the conversation ended. Unfortunately the details of our conversation changed with Mr. Williams interpretation in the email he sent to you and several others. I communicated my concerns with a text message to Mr. Williams later because he harassed me and I was obligated to let him know. I now feel that I am being harassed, embarrassed and bullied by Mr. Williams and the email communication he has sent to various individuals proves his lack of professionalism. My meeting attendance has never been a problem with prior leadership or with the current leadership until now. It is true that I attended three meetings this year, I planned to make the fourth meeting, unfortunately, Mr. Williams changed the meeting date and I had a conflict. I met all requirements to officiate basketball games for the SCHL by attending all required meetings. Mr. Williams has shared a lot of damaging information that I did not know concerning my colleagues that have communicated that they did not want to work with me and blocked schools. I know that I blocked CCES and Hillcrest Middle School myself due to personal reasons. If there were any schools that blocked my assignment other than the schools I blocked, I was scheduled that the same schools this year along with some of the same officials. I would like to know the officials that blocked me, it would help me in the future if those same officials officiate other sports. Mr. Williams has his circle of supporters that he has out in leadership positions and many of those individuals character are similar to his. I am an educated professional and sometimes my demeanor may clash with individuals whose behavior is unprofessional and uncouth. Mr. Williams has no legitimate reason to discuss or set parameters towards my participation with the SCHL or District One Board with my continued participation as a basketball official. Furthermore, I would like Mr. Williams to present a detailed list of arrival times for all District One officials for all meetings. I have done nothing out of character. I would like a written apology from Mr. Williams for his lack of professionalism and the pain and suffering he has caused me.

1 of 3

ELECTRONICALLY FILED - 2017 Mar 16 6:38 PM - GREENVILLE - COMMON PLEAS - CASE#2016CP2302113

5346/1536
Produced by SCHSL
016

Name	31-Aug-15	14-Sep-15	21-Sep-15	28-Sep-15	5-Oct-15	12-Oct-15	19-Oct-15	26-Oct-15	2-Nov-15	9-Nov-15	11-Jan-15
Double / Single						Mechanic's MTG					Mid-Season Mtg
Crotts, Michael	****			****				****		****	
Edwards, Mack			****			****	****	****	****	****	
Elmer, Joe	****	****		****	****	****		****	****	****	****
Greer, Gordon	****		****			****		****	****	****	****
Richburg, Aminah	****		****						****		
Wnukowski, Bob	****					****	****	****			

Copied from the Attendance spreadsheet for SCBOA District #1 for 2015/2016 season.

Each Official is marked as in attendance with the **** mark for the dates detailed. Blank Cell indicates Absent for that date.

The cells identified with the Red Triangles in the upper right corner have comments attached to the cell as detailed below:

- Joe Elmer: 21 Sept-SCHSL Volleyball Match Assignment
- Gordon Greer: 31 Aug-Left Early @ 7:00 Personal; 21 Sept-Left Early @ 7:45 Personal; 19 Oct- SCHSL Volleyball Match Assignment
- Aminah Richburg: 21 Sept- Arrived Late to Mtg @ 7:35; 19 Oct- Arrived Late to Mtg @ 7:05
- Bob Wnukowski: 12 Oct- Left Early @ 7:10 Personal

Kevin N. Brown SCBOA District #1 Secretary/Treasurer

Name	31-Aug-15	14-Sep-15	21-Sep-15	28-Sep-15	5-Oct-15	12-Oct-15	19-Oct-15	26-Oct-15	2-Nov-15	9-Nov-15	11-Jan-15
Double / Single						Mechanics Mtg					Mid-Season Mtg
Joe Elmer											
Gordon Greer											
Aminah Richburg											
Bob Whukowski											

Copied from the Attendance spreadsheet for SCBOA District #1 for 2015/2016 season.

Each Official is marked as in attendance with the **** mark for the dates detailed. Blank Cell indicates Absent for that date.

The cells identified with the Red Triangles in the upper right corner have comments attached to the cell as detailed below:

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- Aminah Richburg: 21 Sept- Arrived Late to Mtg @ 7:35; 19 Oct- Arrived Late to Mtg @ 7:05
- Bob Whukowski: 12 Oct- Left Early @ 7:10 Personal

K. N. Brown

8/26/16

Kevin N. Brown

SCBOA District #1 Secretary/Treasurer

(SCHSL) (Williams) Rico Williams' Memorandum in Support for Summary Judgment

IN THE STATE OF SOUTH CAROLINA)
IN THE COUNTY OF GREENVILLE)

Aminah A. Richburg,)

Plaintiff,)

vs.)

E.A. "Rico" Williams, Director District)
One SC Basketball Officials Association)
and the South Carolina High School)
League,)

Defendants.)

IN THE COURT OF COMMON PLEAS

C.A. No.: 2016-CP-23-2113

**MEMORANDUM OF LAW
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT BY
DEFENDANT E.A. "RICO" WILLIAMS**

Defendant E.A. "Rico" Williams ("Williams" or "Defendant") submits this Memorandum of Law in Support of his Motion for Summary Judgment, which was filed on February 24, 2017. A hearing on the motion has been scheduled for March 20, 2017 at 3:00 p.m.

Introduction¹

Defendant Rico Williams is the District One Director for the South Carolina Basketball Officials Association ("SCBOA"). The SCBOA is a separately created organization that operates under the South Carolina High School League ("SCHSL"). The SCBOA provides training for basketball officials; it also maintains a booking office for providing basketball officials for high schools, prep schools and other who need the services of basketball officials. (Williams Aff., ¶ 3). He has been a member of the SCBOA for more than 20 years, and has been the District One Director since July 2015. (Williams Aff., ¶¶ 3, 10). As is required of all SCBOA members, Mr. Williams is required to sign the SCBOA District 1 Contract, which outlines rules and regulations governing its members. Members are also bound by the Code of Ethics. (Williams Aff., ¶¶ 6-9).

¹ The supporting facts and background information is set forth in the Affidavit of Rico Williams, which was filed with the Court on February 24, 2016.

Plaintiff Aminah Richburg first became a member of SCBOA District One for the school year 2013-2014. On February 29, 2016, the District One Board of Directors voted not to accept Plaintiff's application for renewal for the year 2016-2017. On March 21, 2016, Rico Williams notified Plaintiff of the Board's decision. (Williams Aff., ¶¶ 35, 37, 38). Although the District One Board decided not to accept any future applications from Plaintiff, Plaintiff continues to officiate games in other sports, such as volleyball, football, lacrosse, and softball.

On March 31, 2016, Plaintiff filed this lawsuit alleging that Defendants had engaged in a "false narrative" about her performance as a basketball referee. (Complaint, ¶ 15.a). The communications at issue were contained in an email from Rico Williams to Plaintiff, which had been sent to her in response to a text message she had sent to him. On the email, Williams copied members of the District One Board, and Skip Lax, who was the SBCOA Commissioner of Officials.

The Alleged Defamatory Email

The alleged defamatory email was sent on February 5, 2016 and is repeated verbatim below:

Aminah,

On Tuesday Feb 2, I called you and left a message asking you to call me. On Wednesday (sic) Feb 3, I left the same message as well as a text. After you subsequently called me back I mentioned to you that the games I scheduled for you to work Thursday, Feb. 4 at Furman's Intramural Program were indeed still on, and I informed you that someone at your last game at Beck Middle School on Feb. 2 had told me that you were officiating with "jogging/workout" type pants that were very tight. If you remember, last year during the JV tournament I asked you to wear your official's pants instead of those "jogging" pants whenever you're representing District One and you said you would. When I asked you was that report accurate from Monday you replied, "I don't wear jogging pants. Is that all?" I then asked you if it was problematic for you with me asking that question and your response was, "I don't wear jogging pants. I'm at work. Is that all?" I then stated that we talk again soon.

Even though your responses were short, terse and rude I was going to let the matter rest for another day; until after a few minutes you sent me a lengthy text which follows, and I quote:

"Please discontinue the harassing communications. Previous District One leaders presented a higher level of professionalism which made officiating (sic) enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any games assignments I will communicate my disdain to the SCHL."

I communicated your text and above information to Skip Lax, and I received requested information from Bob Wnukowski and Kevin Brown. From our records you are marked of (sic) by two schools and by ten (10) officials and literally every one of them are higher rated either sub-Varsity officials are (sic) officials at the Varsity level who still work JV games. Many of them have indicated to me your unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary. Additionally, before the season I required officials working other SCHSL sports (such as Volleyball that you work) to attend four (4) of our regularly (non required) scheduled meetings which began at 6 pm and ended at 8 pm. You were present at the first meeting from beginning to end; a Sept. 21 meeting you arrived at 7:35 pm; an Oct. 19 meeting you arrived at 7:05; and a Nov. 2 meeting you arrived at 6:50 pm. Therefore your meeting attendance equates to about 2 ½ meetings. In addition, you were absent from our required Mechanics meeting and required Mid-season meeting which would bring your absent total to roughly eight (8) out of eleven (11) meetings.

Upon realizing these facts I contemplated removing you from your JV tournament assignment Saturday (Feb. 6) afternoon. But I will leave your schedule as is, and you will not be considered for any future assignments until your status as a District 1 member is reviewed by the Board of Directors, which brings me to the final issue if you will. Without repeating again word for word your comments concerning "professionalism", "declining standards", etc. it is obvious that you feel your membership is not being served adequately by the "present leadership". I and we certainly don't want any member to be so uncomfortable in our District, therefore a transfer to another District that best suites you may be in order. As a matter of fact, I will facility the communication to any District in South Carolina that you choose if that is the route that you deem favorable.

Regards,
E.A. "Rico" Williams
Director, District 1
SC Basketball Officials Association
(864) 430-9884
Ericowms@charter.net

Plaintiff's Complaint should be dismissed because (1) the statements made by Mr. Williams in the February 5, 2016 email were true, and (2) the statements made by Mr. Williams in the February 5 email were subject to a qualified privilege.

A. The Statements Made by Rico Williams in the February 5, 2016 Email Were Entirely True.

Because the alleged defamation is based on emails, Plaintiff's claim is for libel. In order to prove her claim of libel, Plaintiff must prove: "(1) A false and defamatory statement was made; (2) the unprivileged publication of the statement to a third party; (3) the publisher was at fault; and (4) either the statement was actionable irrespective of harm or the publication of the statement caused special harm." *Harris v. Tietex Intern'l Ltd.*, 417 S.C. 533, 540, 790 S.E.2d 411, 415 (Ct. App. 2016). Truth is an absolute defense to a claim of defamation. The defense of truth is proven "where the evidence establishes that the statement was substantially true." *Ross v. Columbia Newspapers, Inc.*, 266 S.C. 75, 221 S.E.2d 770, 772 (1976).

Rico Williams has presented evidence that the matters stated in his February 5th email to Plaintiff were true:

- (a) Statement that Plaintiff is Blocked by Ten Officials and Two Schools: This statements was true when made, as shown by the Affidavits of Rico Williams (¶ 29) and Skip Lax, and confidential documentation produced in response to Plaintiff's discovery requests;
- (b) Reports that Plaintiff was not open to constructive criticism:² This statement was true when made as shown by the Affidavit of Rico Williams, ¶ 30.

² Statements about Plaintiff's reputation among her peer officials are admissible. *See* South Carolina Rule of Evidence 803(21), which provides a hearsay exception for statements concerning "[r]eputation of a person's character among associates or in the community."

(c) Statement about Plaintiff's poor attendance at meetings. This statement was true, as shown by records produced in the case and the Affidavit of Rico Williams, ¶ 20.

In responding to a properly supported Motion for Summary Judgment, the opposing party "may not rest upon the mere allegations" of her pleading, but her response "by affidavits or as otherwise provided in" Rule 56, "must set forth specific facts showing that there is a genuine issue for trial." S.C.R.Civ.P. 56(e). During this case, Plaintiff has not produced any evidence, either through her deposition testimony or otherwise, that would show or even infer that the statements made by Rico Williams were not true. For this reason alone, summary judgment should be granted in favor of Defendant Williams.

B. Rico Williams' Communications with Members of the District One Board and Skip Lax, the Commissioner of Officials, Were Privileged.

Summary judgment should also be granted because the communications contained in Mr. Williams' email were privileged.

It is the duty of the Court to determine if a statement is privileged. *Murray v. Holnam, Inc.*, 344 S.C. 129, 542 S.E.2d 743, 749 (Ct. App. 2001) (internal citations omitted). "While abuse of privilege is ordinarily an issue for the jury, . . . in the absence of a controversy as to the facts . . . , it is for the court to say in a given instance whether or not the privilege has been abused or exceeded." *Id.* (quoting *Woodward v. South Carolina Farm Bureau Ins. Co.*, 277 S.C. 29, 282 S.E.2d 599 (1981)).

"A communication made in good faith on any subject matter in which the person communicating has an interest or duty is qualifiedly privileged if made to a person with a corresponding interest or duty even though it contains matter which, without this privilege, would be actionable." *Murray*, 542 S.E.2d at 749, citing *Constant v. Spartanburg Steel Prods.*

Inc., 316 S.C. 86, 447 S.E.2d 194 (1994) and Prentiss v. Nationwide Mut. Ins. Co., 256 S.C. 141, 181 S.E.2d 325 (1971).

Under the defense of conditional or qualified privilege, a defendant is not liable for the publication "if (1) the matter is published upon an occasion that makes it conditionally privileged, and (2) the privilege is not abused." Harris v. Tietex Intern'l Ltd., 417 S.C. 533, 540, 790 S.E.2d 411, 415 (Ct. App. 2016). "The party asserting a qualified privilege must prove the following elements: (1) good faith, (2) an interest to be upheld, (3) a statement limited in its scope to this purpose, (4) a proper occasion, and (5) publication in a proper manner and to proper parties only." *Id.* "Whether an occasion gives rise to a qualified or conditional privilege is generally a question of law for the court." *Id.*

Defendant Williams is the Director for the SCBOA District One. In this capacity, he is responsible for enforcing professional standards and making sure that officials abide by the rules of the SCBOA. (See SCBOA District 1 Contract, which states in relevant part: "*I understand that the District 1 director has the authority to enforce professional standards and to accept or reject my transfer to another district or readmittance to the SCBOA.*") Furthermore, Mr. Williams' email was in direct response to a text message from Plaintiff in which she indicated she was going to initiate contact with the SCHSL regarding Mr. Williams' alleged "monopoly status" and how he allegedly "manipulated" the District 1 organization. Considering Plaintiff's remarks, it was entirely appropriate and a "proper occasion" for Mr. Williams to include the District One Board members, and Skip Lax on his email concerning Plaintiff's unprofessional conduct. The Board members and Skip Lax were all proper parties to the communication because it involved potential disciplinary action to be taken against Plaintiff as a District One official.

Furthermore, Rico Williams' statements were made in good faith and without any malice whatsoever. "Where the occasion gives rise to a qualified privilege, there is a prima facie presumption to rebut the inference of malice, and the burden is on the plaintiff to show actual malice or that the scope of the privilege has been exceeded. To prove actual malice, the plaintiff must show that the defendant was activated by ill will in what he did, with the design to causelessly and wantonly injure the plaintiff, or that the statements were published with such recklessness as to show a conscious disregard for [the] plaintiff's rights. Although abuse of the conditional privilege is generally an issue for the jury to decide, in the absence of a controversy as to the facts, it is for the court to determine. Similarly, if the plaintiff fails to present evidence of a genuine issue of fact as to actual malice and the qualified privilege is otherwise applicable, summary judgment may be granted." *Tietex*, 790 S.E.2d at 415-16 (*internal citations omitted*).

Once again, Plaintiff has not come forward with any evidence to show that Rico Williams exceeded the privilege or acted with any malice toward her. Because Plaintiff had accused Mr. Williams of "harassing" her and because of her stated intention to report to the SCHSL about Mr. Williams' alleged "monopoly status," Mr. Williams felt that it was necessary to provide the Board and Mr. Lax with a complete summary of the prior communications. (Williams Aff., ¶ 28). In Mr. Williams' experience as a District One Board member, the Board would typically become involved in disciplinary issues. (Williams Aff., ¶ 31). Furthermore, Skip Lax was the Commissioner of Officials, who had a similar interest in official disciplinary action. Further, the communication did not contain any negative adjectives or characterization of Plaintiff, but was entirely factual in nature. Notably, Mr. Williams concluded by extending an "olive branch" to Plaintiff, by offering to assist her with a transfer to another district, if that was her preference.

Clearly, Mr. Williams' email was made in a proper manner to proper parties only, and therefore, is subject to a qualified privilege.

Conclusion

For the reasons set forth above, Defendant Rico Williams moves for the entry of summary judgment in his favor.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

March 20, 2017

s/Sarah Day Hurley
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Telephone: (864) 552-4651
Attorney for Defendant E.A. "Rico" Williams

(SCHSL) (Williams) Affidavit of Rico Williams

STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS

COUNTY OF GREENVILLE

Civil Action No. 2016-CP-23-02113

AMINAH A. RICHBURG,

Plaintiff,

vs.

E.A. "RICO" WILLIAMS, DIRECTOR
DISTRICT ONE SC BASKETBALL
OFFICIALS ASSOCIATION AND THE
SOUTH CAROLINA HIGH SCHOOL
LEAGUE,

Defendants.

AFFIDAVIT OF DEFENDANT
E.A. "RICO" WILLIAMS

PERSONALLY appeared before the undersigned Notary Public, E.A. "Rico" Williams,
who upon being duly sworn did depose and say as follows:

1. I am over the age of eighteen (18) years, have personal knowledge of the facts stated herein, and am competent to make this affidavit.
2. I reside in Greenville County and am currently employed with Federal Express as a Materials Handler.
3. For more than 20 years, I have been a basketball official for District One of the South Carolina Basketball Officials Association ("District One"). The South Carolina Basketball Officials Association ("SCBOA") is a separately-created organization that operates under the South Carolina High School League ("League"). The SCBOA is governed by its own Constitution and By-Laws, and the purpose of the SCBOA is for the training and development of basketball officials, as well as maintenance of a

booking office for high schools, prep schools, and others desiring the services of basketball officials.

4. Officials can become certified in more than one sport; I choose to officiate only basketball games.
5. In order to become and remain a certified SCBOA basketball official, each year I have attended mandatory training meetings, studied basketball rules and regulations, watched films, received training and feedback from other officials, and taken and passed annual tests for certification as a basketball official.
6. Every District One basketball official must sign a "SCBOA District I Contract." The contract provides a guideline for professional conduct. It also clearly states that an official may be dismissed by the SCBOA for failure to abide by professional standards set forth by the SCBOA.
7. The SCBOA District I Contract signed by all officials states in relevant part that "the District I Director has the authority to enforce professional standards and to accept or reject [an official's] transfer to another district or readmittance to the SCBOA."
8. District One basketball officials are independent contractors, not employees. Officials are paid a one-time fee for officiating services at the end of every game.
9. Every basketball official is subject to a Code of Ethics (Williams 00002). Aminah Richburg, as a District One basketball official, was bound by the Code of Ethics.
10. On July 1, 2015, I became the Director for the District One Basketball Association. Prior to that, I held the position of Associate Director for 12 years. Prior to becoming an Associate Director, I had served on the District One Board for five years as a non-officer Board member.

11. As the Director, I have many responsibilities, including scheduling and leading all basketball officials' meetings, monitoring attendance at such meetings, supervising game and scrimmage schedules and assignment of officials, and attending quarterly Directors' meetings. A full list of my responsibilities is included in the "SCBOA Director Responsibilities", which is contained on the League's website.
12. Skip Lax is an Assistant Commissioner of the South Carolina High School League, who serves as the Commissioner of Officials. The role of the Commissioner of Officials is set forth in the By-Laws of the SCBOA.
13. In addition to serving as the Director for the District One Basketball Association, I also assist in scheduling non-League basketball games for local club tournaments, college intramural, and city recreational games. One of the reasons I do this is to help individuals who are interested in basketball officiating opportunities learn, gain experience, develop their skills, and earn additional money.
14. In 2014, Aminah Richburg expressed an interest in officiating non-League games as well as SCBOA games, so when possible, I would facilitate some of those assignments to her. Those assignments included city recreational games at the YMCA and intramural games at Furman University. Ms. Richburg earned additional fees, outside of any fees earned by officiating League games, through these assignments.
15. At the beginning of my term as Director in July 2015, I implemented a few new requirements for our District members, one being that I asked volleyball officials who were also basketball officials to participate more in the basketball meetings. Because

some officials may officiate more than one sport, sometimes conflicts arise because meetings for one sport may overlap with meetings for another sport.

16. The meetings are important because they serve as a training ground for officials.

Among other things, basketball rules and regulations are reviewed and discussed at every meeting.

17. Before I became the Director, the previous District One Director allowed volleyball officials to miss all basketball meetings, except three which are mandated by the League.

18. Several District One basketball officials, including Aminah Richburg, officiated both basketball and volleyball games.

19. After consulting with other Directors on how they have handled attendance and meeting requirements for officials who work more than one sport, I decided to implement a new rule which required basketball officials to attend at least four (4) of the regularly scheduled meetings, which began at 6:00 p.m. and ended at 8:00 p.m. I communicated this new rule to all District One basketball officials at the beginning of the 2015-2016 season.

20. Aminah Richburg frequently came late to the basketball meetings during the 2015-2016 season. At the first meeting, Ms. Richburg was present from beginning to end. At the meeting on September 21, she arrived at 7:35 p.m. At the October 19 meeting, she arrived at 7:05 p.m. At the meeting on November 2, she arrived at 6:50 p.m. I believe these times are accurate based on records kept by Kevin Brown, the Secretary/Treasurer for District One.

21. Aminah Richburg also failed to attend the required "Mechanics" meeting and required "Mid-Season" meeting. This meant that she missed roughly eight (8) out of eleven (11) meetings that were held for District One basketball officials.
22. On or about February 2, 2016, Aminah Richburg was assigned to officiate a game at Beck Middle School. Later that day, I was informed by the other official who worked that game, John Williams, that Ms. Richburg had officiated wearing tight "jogging/workout" pants, which are not approved attire for District One officials.
23. The previous year, during a JV tournament, I had to speak to Ms. Richburg about the fact that she was wearing inappropriate clothing to officiate a game, and reminded her that she needed to wear the official's pants when representing District One. So, this was not the first time I had learned that Ms. Richburg failed to comply with District One uniform requirements.
24. Following receipt of this information on February 2, 2016, I called and left a voicemail message for Ms. Richburg and asked her to call me. I also sent her a text message asking her to call me. The purpose of my call was twofold: I wanted to confirm her availability to officiate a non-League game at Furman University, and I wanted to ask her if it was true what had been reported about what she was wearing at the Beck Middle School game.
25. When she called me back, I informed her that someone reported that she was wearing tight jogging pants to officiate the game at Beck Middle School on February 2. When I asked her if the report was true, she curtly replied "I don't wear jogging pants. Is that all?" I then asked her if it was problematic for her with me asking that question. She then stated "I don't wear jogging pants. I'm at work. Is that all?" I did not

dispute her response and stated that we would talk again soon. Although Ms. Richburg's response to me was short, terse and rude, I decided to let it go.

26. A few minutes later, Ms. Richburg sent me a lengthy text which stated the following:

"Please discontinue the harassing communications. Previous District One leaders presented a higher level of professionalism which made officiating enjoyable unfortunately the present leadership standards have declined. I will communicate your monopoly status with assigning games with various organizations and how it manipulates the District One organization and your leadership position to the SCHL. If I do not respond to a text or call, I am unavailable. I confirmed my availability for Thursday earlier. If you have games for me in the future I welcome any professional communication you send. If I do not receive any game assignments I will communicate my disdain to the SCHL."

27. On February 5, 2016, I sent a follow up email to Ms. Richburg summarizing our previous communications, acknowledging her displeasure with current leadership, and offering to assist her with transfer to another District if that was her preference. (Williams 00004-00005).

28. On the email, I copied Skip Lax, who is the Commissioner of Officials, and the members of the District One Board of Directors, so they would be aware of the communication that had been sent. Also, because she had accused me of "harassing" her and stated that she was going to "communicate" to the League regarding my "monopoly status" and how I had "manipulated the District One organization," I felt it was necessary to provide the Board and Mr. Lax with a complete summary of our previous communications.

29. In my email to Ms. Richburg, I also mentioned to her that she had been "marked off" by ten (10) officials and two schools. This was true. (A list of the officials who had blocked Aminah Richburg, and the dates such blocks were entered, has been provided to Ms. Richburg in connection with this lawsuit and is marked "Confidential -- Williams 00038").
30. I also informed Ms. Richburg that many of the officials who had blocked her from their games had concerns about her "unwillingness to accept constructive criticism, advice, instruction or any information given by them that you may deem unnecessary." This was true. Prior to this incident, and since I became the District One Director, a number of officials who had worked with Ms. Richburg had expressed to me their desire not to officiate games with Ms. Richburg anymore based on her unwillingness to accept constructive criticism and advice. Despite the negative comments that I had received, I attempted to help Ms. Richburg improve her skills by continuing to offer opportunities for her to officiate non-League basketball games, in order to improve her skills and gain experience.
31. As the District One Director, I have the authority to reject an official's renewal application. However, in fairness to Ms. Richburg, and because her complaint seemed to be aimed at me personally, I decided it would be best to recuse myself from making any decision to discipline her. Therefore, I decided to have the Board review and vote on the matter of whether to discipline, suspend, and/or terminate Ms. Richburg's District One membership based on the issues addressed in my email. In my experience as an Associate Director, the District One Board would become involved in decisions to discipline officials, including termination decisions.

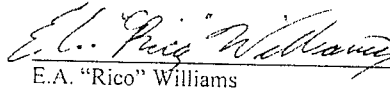
32. Therefore, on February 25, 2016, I sent an email to Ms. Richburg to inform her that the District One Board of Directors would be reviewing her status as a future SCBOA District One member at its next Board meeting. I invited Ms. Richburg to attend the Board meeting so that she could communicate directly with the Board members and present any information on her behalf. (Williams 00010).
33. Ms. Richburg never responded to my February 25 email.
34. Ms. Richburg also did not attend the Board meeting to which she was invited.
35. At the Board meeting on February 29, 2016, the members of the Board voted not to accept Ms. Richburg's application for membership in District One during the 2016-2017 school year. I did not vote at the Board meeting. My vote would only have been required in the event of a tie. The majority of the Board members voted not to accept any renewal application that Ms. Richburg might submit.
36. On March 14, 2016, I notified Skip Lax, Jerome Singleton, and Joedy Moots of the District One Board's decision to reject Ms. Richburg's application for renewal in 2016-2017. I also asked them to approve a draft email I was going to send to Ms. Richburg to advise her of the Board's decision. Due to the positions that Jerome Singleton holds (and held at the time) as Executive Director of the League, that Skip Lax holds (and held at the time) as Commissioner of Officials, and that Joedy Moots held (at the time) as the Officials' Representative, and due to the seriousness of the situation, I believed it was appropriate to inform them of the Board's decision, and to seek their advice prior to notifying Ms. Richburg of the same. I also anticipated that Ms. Richburg would appeal the Board's decision, so I sought the League's guidance

to ensure that I was handling my communications with Ms. Richburg in an appropriate manner.

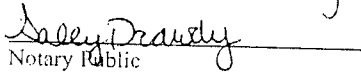
37. On March 21, 2016, I sent the email to Ms. Richburg informing her that the Board had voted that, if she had any intent to apply for future membership in District One, her application would not be accepted. On this email, I copied the members of the District One Board of Directors, and Skip LaX, Jerome Singleton, and Joedy Moots as representatives of the League, in order to keep them apprised of my communications with Ms. Richburg. (Williams 00013).

38. To the best of my knowledge, Ms. Richburg did not seek a review of the District One Board's decision to reject her application for renewal in 2016-2017.

FURTHER AFFIANT SAYETH NOT.


E.A. "Rico" Williams

Sworn to and subscribed before me
this the 20th day of February, 2017


Notary Public

My Commission Expires: February 20th, 2019

(SCHSL) (Williams) Affidavit of Skip Lax

STATE OF SOUTH CAROLINA)

COUNTY OF GREENVILLE)

IN THE COURT OF COMMON PLEAS

Civil Action No. 2016-CP-23-02113

AMINAH A. RICHBURG,)

Plaintiff,)

vs.)

E.A. "RICO" WILLIAMS, DIRECTOR)
DISTRICT ONE SC BASKETBALL)
OFFICIALS ASSOCIATION AND THE)
SOUTH CAROLINA HIGH SCHOOL)
LEAGUE,)

Defendants.)

AFFIDAVIT OF SKIP LAX

PERSONALLY appeared before the undersigned Notary Public, Skip Lax, who upon being duly sworn did depose and say as follows:

1. I am over the age of eighteen (18) years, have personal knowledge of the facts stated herein, and am competent to make this affidavit.
2. I reside in Lexington County and am currently employed by the South Carolina High School League (SCHSL or League) as an Associate Commissioner.
3. The League's Constitution, By-Laws, and Rules and Regulations are promulgated by the member schools, which consist of over 400 high schools and middle schools throughout South Carolina. Day-to-day operations of the SCHSL are conducted by the League's staff of approximately 10 individuals. The League serves various purposes in connection with interscholastic athletic programs, including but not limited to the development of programs for athletic competition, and the promotion of uniformity of standards in interscholastic athletic competition. The League governs interscholastic athletic contests in various sports, including

football, volleyball, competitive cheer, basketball, wrestling, soccer, track and field, baseball, softball, golf and tennis.

4. As part of my job responsibilities, I have been appointed by the Executive Committee of the SCHSL as the Commissioner of Officials for the South Carolina Basketball Officials Association (SCBOA). I have served in this capacity continuously since the 2010-2011 school year.

5. Under the By-Laws of the SCBOA, the Commissioner of Officials has the following responsibilities: (1) the Commissioner of Officials is in charge of all records pertaining to the business of the SCBOA; (2) the Commissioner of Officials shall receive all applications for membership, which have been previously approved or disapproved by the director of the district where the applicant resides; (3) the Commissioner of Officials will ensure that district directors furnish an accepted applicant with a copy of the Constitution and By-Laws of the SCBOA, along with booking office regulations; (4) the Commissioner of Officials shall maintain all reports and records of the members of the SCBOA; (5) the Commissioner of Officials shall maintain a record of all game assignments and schedules of member schools; and (6) the Commissioner of Officials shall furnish each member school a list of the officials, if requested.

6. Each year the SCHSL provides ratings for every basketball official in the state of South Carolina. The rating system is set forth in the By-Laws of the SCBOA and is based on factors such as written examination scores, experience, peer ratings, attendance at clinics and training sessions, and cooperation points. These ratings impact game assignments for basketball officials.

7. The SCHSL and the SCBOA use computer software created by ArbiterSports called ArbiterOne to manage scheduling for basketball officials, as well as record-keeping. The SCHSL would have access to ArbiterOne records for all sports officials at the varsity level, including officials who officiate in different sports, while the SCBOA would only have access to the records of basketball officials at the sub-varsity level.

8. For scheduling of basketball officials at the varsity level, the SCHSL maintains the ArbiterOne software system to make sure that officials are accepting assignments through ArbiterOne. For scheduling of basketball officials at the sub-varsity level, the local districts of the SCBOA maintain the ArbiterOne software to make sure that officials are accepting assignments. Each basketball official has access to their profile on ArbiterOne to set parameters for scheduling contests, such as unavailable dates and times, distance limitations, etc.

9. Any basketball official may "block" another official from being assigned games with him/her. This is set by the official through ArbiterOne, and no reason for the block is necessary. Additionally, a basketball official may block assignments at a particular school. This is also set by the official through ArbiterOne, and no reason for the block is necessary.

10. A school may block an official for a particular sport or for all sports, and no reason for the block is necessary. As a matter of general practice, the SCHSL will also enter blocks for each official's high school alma mater and for the high school in the attendance zone where the official resides.

11. The blocks made by or against an official, either with respect to a member school or another official, are not shared with other officials. This is to promote the integrity of contests and the working relationships of officials and schools who may only be "blocked" in particular sports.

12. I am aware of Rico Williams' statement in his email dated February 5, 2016, that Ms. Richburg had been marked off by ten officials and two schools as of that date. Based on the ArbiterOne records produced by Mr. Williams and the SCHSL, that statement would be true.

13. According to the ArbiterOne records available to the SCHSL, Ms. Richburg has been marked off by ten officials in other sports at the varsity and sub-varsity level. Some of these occurred after February 2016.

14. Ms. Richburg has never officiated a basketball contest at the varsity level. Therefore, the SCHSL would not expect for her to have been blocked by other basketball officials at the varsity level. The list of officials' blocks produced by Mr. Williams would be a list of the officials that blocked Ms. Richburg at the sub-varsity level.

15. Ms. Richburg emailed me after receiving Mr. Williams' email dated February 5, 2016, requesting various information referenced in the email. Ms. Richburg also referred to Mr. Williams as lacking professionalism and being uncouth, and she stated that she would like a written apology from Mr. Williams. I responded that the SCHSL does not share "blocks" by schools or peers, and I told her that her concerns were a local matter to be handled at her district level. I felt that her concerns were a local matter because she appeared to be primarily concerned with actions of the district director that did not involve varsity scheduling or a specific contest.

16. Joedy Moots was the Officials' Representative on the Executive Committee of the SCHSL in 2015-2016. I am aware that Ms. Richburg also emailed Mr. Moots, but I never spoke with Mr. Moots about this issue.

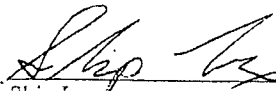
17. The By-Laws of the SCBOA sets forth the process for an official to appeal a decision of its local Board of Directors. It is my understanding that Ms. Richburg did not pursue an appeal of the District One Board of Directors' decision regarding her future membership.

18. Ms. Richburg either has officiated or is eligible to officiate League contests in the sports of volleyball, football, softball, and lacrosse for the 2016-2017 school year.

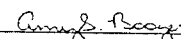
19. Based on my review of the communications between Mr. Williams and Ms. Richburg, as well as the documentation of the action by the District One Board of Directors, I believe that Mr. Williams and the Board of Directors acted within the scope of their authority as the leadership of District One of the SCBOA. Neither I, nor anyone else from the SCHSL, was present or otherwise involved with the February 29th Board meeting in which Ms. Richburg's status was discussed and voted upon.

20. I never spoke with anyone outside the SCHSL or SCBOA regarding this issue with the membership of Aminah Richburg in the SCBOA.

FURTHER AFFIANT SAYETH NOT.


Skip Lax

Sworn to and subscribed before me
this the 21 day of February, 2017


Notary Public

My Commission Expires: June 3, 2026

(SCHSL)South Carolina High School League's Motion for Summary Judgment

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

IN THE COURT OF COMMON PLEAS

Aminah A. Richburg,

Plaintiff,

vs.

E.A. "Rico" Williams, Director,
District One S.C. Basketball
Officials Association, and the
South Carolina High School
League,

Defendants.

Civil Action No. 2016-CP-23-02113

**DEFENDANT'S, SOUTH CAROLINA
HIGH SCHOOL LEAGUE'S, NOTICE
OF MOTION AND MOTION FOR
SUMMARY JUDGMENT**

TO: AMINAH A. RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF;
YOU WILL PLEASE TAKE NOTICE that the defendant, South Carolina High School League, will move before the Presiding Judge of the Greenville County Court of Common Pleas on the tenth (10th) day after the service hereof at 10:00 a.m. or as soon thereafter as counsel may be heard for an Order dismissing the Complaint against it, pursuant to Rule 36 of the South Carolina Rules of Civil Procedure.

The basis of this Motion is that (a) the Plaintiff's claims against the South Carolina High School League are barred by the immunity granted to the League under the South Carolina Tort Claims Act, S.C. Code Ann. § 15-78-10, *et seq.*; and (b) Plaintiff's claim for defamation against the South Carolina High School League fails as a matter of law, as plaintiff cannot meet the necessary elements of this cause of action.

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This Motion is supported by the affidavit of Skip Lax, Assistant Commissioner and Commissioner of Officials of the South Carolina High School League, and a memorandum that will be filed prior to or at the time of the hearing in this matter.

Respectfully submitted,

SOWELL GRAY ROBINSON STEPP &
LAFFITTE, L.L.C.

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Attorneys for Defendant, South Carolina High
School League

Columbia, South Carolina

February 27, 2017

(SCHSL) (Williams) Rico Williams Response in Opposition to Plaintiffs Motion to Compel

IN THE STATE OF SOUTH CAROLINA)
IN THE COUNTY OF GREENVILLE)

Aminah A. Richburg,

Plaintiff,

vs.

E.A. "Rico" Williams, Director District
One SC Basketball Officials Association
and the South Carolina High School
League,

Defendants.

IN THE COURT OF COMMON PLEAS

C.A. No.: 2016-CP-23-2113

**DEFENDANT RICO WILLIAMS'
BRIEF IN OPPOSITION TO
PLAINTIFF'S MOTION TO COMPEL**

Defendant E.A. "Rico" Williams ("Williams" or "Defendant") submits this Brief in Opposition to Plaintiff's Motion to Compel, which is scheduled to be heard on Monday, March 20, 2017 at 3:00 p.m.

Plaintiff's accusation that Defendants have failed to produce documents and failed to cooperate in discovery is patently false. Defendants have responded to multiple interrogatories and requests for production. More specifically, Defendant Williams has served the following discovery responses:

Defendant Williams' Discovery Responses:

- **August 25, 2016** – Served Defendant's Answers to Plaintiff's First Set of Continuing Interrogatories and Responses to Plaintiff's First Set of Request for Production, along with Defendant's documents marked "Williams 00001 -- 00013";
- **September 1, 2016** – Served Defendant's documents marked "Williams 00014 -- 00037";
- **September 29, 2016** – Served Defendant's Supplemental Answers to Plaintiff's First Set of Continuing Interrogatories;

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- **October 28, 2016** – Served Defendant's Second Supplemental Answers to Plaintiff's First Set of Continuing Interrogatories;
- **October 31, 2016** – Served Defendant's Third Supplemental Answers to Plaintiff's Continuing Set of Interrogatories;
- **November 23, 2016** – Served Defendant's Answers to Plaintiff's Second Set of Continuing Interrogatories;
- **January 18, 2017** - Served Defendant's Fourth Supplemental Answers to Plaintiff's First Set of Continuing Interrogatories, along with a copy of Confidential document marked "Williams 00038" showing names and dates of blocks by other officials.

Documents Produced by Defendant Rico Williams:

Defendant Williams has produced all relevant documents that are within his possession, custody or control. The documents he has produced include:

- All email correspondence between him and Aminah Richburg, Skip Lax, and other SCHSL officials regarding communications between Williams and Richburg, and the disciplinary action taken by the SCBOA District One Board of Directors;
- Minutes of the February 29, 2016 District One Board meeting at which time the Board voted not to accept any future application for membership submitted by Aminah Richburg;
- District One records showing member's attendance at SCBOA officials' meetings;
- Records of games officiated by Aminah Richburg;
- SCBOA documents, such as Code of Ethics and the SCBOA District I Contract required of all SCBOA District I members.

In addition, Defendant South Carolina High School League, which has access to additional records, has produced over 100 pages of documents. These documents include ratings of nearly 700 District One basketball officials for the academic years 2013-2014, 2014-2015, and 2015-2016. They also include records of other District One basketball officials who are eligible to officiate other sports, as well as the SCBOA Constitution and By-Laws. The South Carolina High School League has also produced confidential records pertaining to records of blocks by other officials (in addition to the information produced by Rico Williams).

Information Provided by Defendant Rico Williams in Response to Interrogatories:

In response to Plaintiff's interrogatories, Rico Williams has provided extensive information, including:

- Names, home addresses and email addresses of all members of the District One Board as of February 2016;
- Information regarding Mr. Williams' training and experience as a basketball official;
- Information concerning non-League basketball games that were assigned to Aminah Richburg by Mr. Williams;
- The identity of District One Board members who have officiated non-League games.

Objections to Plaintiff's Discovery Requests:

Many of Plaintiff's discovery requests have far exceeded the scope of the claims and defenses in this case. Plaintiff has not demonstrated how her requests are relevant, or how her requests are likely to lead to the discovery of admissible evidence regarding her defamation claim. For example, Plaintiff seeks the Defendants' tax returns, which Defendants have

appropriately objected to producing. In addition, Defendants have objected to Plaintiff's requests for irrelevant information, such as information on gender and ages of District One basketball officials, the amount of experience for each official who was a member of the SCBOA from 2013 through 2016, detailed information about blocks of other officials, and information about any other District One member whose application has been rejected.

Plaintiff's claim against Rico Williams and the South Carolina High School League is one for defamation in connection with an email sent by Mr. Williams to Plaintiff on February 5, 2016. Plaintiff has further alleged that representatives of the South Carolina High School League were negligent in failing to investigate the matter and failing to intervene in the District One Board's decision. There are nearly 700 members of the SCBOA District One, and whether any of those officials have ever been disciplined in any way is not relevant to whether Mr. Williams' email constitutes defamation or whether the League breached any duty to Plaintiff.

Conclusion

In responding to Plaintiff's discovery requests, Defendants have acted in good faith and, when the request was questionable, erred on the side of production. However, Defendants have asserted legitimate objections to the many requests that seek information or documentation that either does not exist or does not bear any relevance whatsoever to Plaintiff's claims. Both Defendants have incurred substantial fees in responding to Plaintiff's numerous requests. Plaintiff must demonstrate clearly what additional information she is seeking and how it is relevant to her claims. Because she has not done so, her Motion to Compel should be denied.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY, P.A.

March 13, 2017

s/Sarah Day Hurley
Sarah Day Hurley (SC Bar No. 16241)
shurley@turnerpadget.com
P.O. Box 1509
Greenville, South Carolina 29602
Telephone: (864) 552-4651
Attorney for Defendant E.A. "Rico" Williams

(SCHSL) (Williams) Joint Memorandum in Opposition to Plaintiff's Motion to Compel

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

IN THE COURT OF COMMON PLEAS

Aminah A. Richburg,)
Plaintiff,)
vs.)

Civil Action No. 2016-CP-23-02113

E.A. "Rico" Williams, Director,)
District One S.C. Basketball)
Officials Association, and the South)
Carolina High School League,)
Defendants.)

**JOINT MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S
MOTION TO COMPEL**

The defendants, South Carolina High School League ("SCHSL" or "League") and Rico Williams, Director of District One of the South Carolina Basketball Officials Association ("SCBOA"), by and through its undersigned attorneys, hereby submit their Memorandum in opposition to Plaintiff's Motion to Compel. As set forth more fully below, the plaintiff's Motion should be denied.

PROCEDURAL BACKGROUND

The plaintiff filed this lawsuit on March 31, 2016. The allegations and claims arise out of a dispute between the plaintiff and the defendant, Rico Williams, that began on or around February 2, 2016. In her Complaint, the plaintiff alleges that the defendant Williams created a "false narrative" about the plaintiff's performance as a basketball referee in reporting issues that involved the plaintiff to the District One Board of Directors. The defendant Williams denies these allegations and has asserted a number of defenses, including the affirmative defense of truth. Ultimately, the District One Board of Directors voted on February 29, 2016, to inform the plaintiff that any future application to District

One would not be accepted. Plaintiff was invited to attend this meeting but did not do so. The allegations relating to the SCHSL appear to be that the SCHSL improperly failed to investigate the reports by Mr. Williams regarding the plaintiff. The SCHSL denies that it had any duty to oversee Mr. Williams' actions in this regard. Furthermore, the SCHSL denies that Mr. Williams committed any actionable torts against the plaintiff.

With respect to the pending Motion, the plaintiff served the undersigned counsel by mail with Interrogatories and Requests for Production dated June 20, 2016. The defendants have responded to these discovery requests¹ and have collectively produced approximately eighty (80) pages of documents to the plaintiff. The only documents that have been identified but withheld are documents that are the subject of a pending motion for a Protective Order. The present Motion was filed by the plaintiff on October 11, 2016. The parties have a conference call currently scheduled for November 1, 2016, at 5:00 p.m. to try and resolve and/or narrow down the issues to be decided by the Court. Because of the Court's directive with regard to filing memoranda prior to the hearing, the defendants are submitting this Memorandum prior to the conference call with the plaintiff.

ANALYSIS

Rule 26 of the South Carolina Rules of Civil Procedure governs the conduct of discovery. Under Rule 26(c), SCRPC, the court "may make any order which justice requires to protect a party or person from annoyance, embarrassment, oppression, or undue burden." A court may also order that certain discovery be had "only on specified terms

¹ Although not necessarily relevant to the present Motion, the SCHSL would like to alert the Court that the plaintiff previously filed a Motion entitled "Request for Hearing" alleging improper actions on the part of counsel for the defendants in not timely responding to discovery. A hearing on this Motion took place on September 20, 2016, before the Honorable Roger Couch, and the plaintiff's Motion was denied. A formal Order has been submitted to Judge Couch but has not yet been filed. The prior motion did not address the merits of the present dispute.

and conditions." Rule 26(c)(2). A trial judge is granted broad latitude to limit the scope of discovery, and the conduct of discovery is within the sound discretion of the trial judge.

Hamm v. S.C. Pub. Serv. Comm'n, 312 S.C. 238, 241, 439 S.E.2d 852, 854 (1994).

Perhaps the most efficient way is to set forth the defendants' understanding of the plaintiff's complaints regarding the defendants' discovery responses, along with the defendants' position regarding the particular disputes. Therefore, the following is the defendants' overview of the current Motion to Compel:

Interrogatory No. 1: Identification of witnesses

Plaintiff's Motion: The plaintiff requests that the first and last names of the District One Board of Directors be disclosed.

Defendants' Position: The defendant Williams provided this information in a Supplemental Response.

Interrogatory No. 3: Listing of documents in possession of the parties

Plaintiff's Motion: The plaintiff has set forth a number of occasions when she officiated scrimmages without pay for schools that are members of the SCHSL and appears to argue that because of this fact, she is entitled to the names of schools and officials that blocked her.

Defendants' Position: This issue should be addressed by the SCHSL's Motion for a Protective Order. Furthermore, the assignments for scrimmages have been produced.

Interrogatory No. 4: "Identify every witness known to you or to your attorney who claim to have seen or heard the Plaintiff through its agents, servants, or employees, make any statement or statements pertaining to any of the events or happenings alleged in the Defendant's answer or in the Complaint, as well as a description of those statements."

Plaintiff's Motion: The plaintiff requests the following (a) detailed list of first and last names of District One Board members; (b) list of Board members present at the meeting on February 29, 2016; (c) list of all Board members that contract and solicit basketball officiating services to various organizations including YBOA besides Rico Williams; (d) all correspondence between Joedy Moots (Officials' Representative on the SCHSL Executive Committee) and Rico Williams; (e) all documents discussed during the Board meeting on February 29, 2016, especially the "Officials Representative Response" that was read during the meeting; (f) ratings of all of her officiating partners from 2013-2016; and (g) the actual vote of all Board members at the February 29, 2016 meeting.

Defendants' Response: Defendants submit that the plaintiff is now asking for very specific documents and information, whereas the original request was a general request. Nonetheless, the defendants would respond that they have provided the full names of District One Board members, and the defendant Williams has previously produced the handwritten notes from this meeting (Bates labeled Williams 00017). Furthermore, the defendant Williams has previously produced the only communication between himself and Mr. Moots (Bates labeled Williams 00009), and this was the "Officials Representative Response" that was read during the meeting. The defendant, SCHSL, has already produced the ratings of every basketball official in the state for the 2015-2016 school year (Bates labeled SCHSL 022-036), and the defendants submit that requesting ratings for 2013-2014 and 2014-2015 is overbroad and irrelevant to the causes of action pled by the plaintiff.

Interrogatory No. 5: Copies of sign-in sheets with arrival times for all members attending SCBOA officials' meetings

Plaintiff's Motion: Plaintiff seeks all sign-in sheets or attendance sheets with arrival times for all members attending meetings of District One of the SCBOA and the SCHSL.

for the past five years. Plaintiff argues that because the defendant Williams communicated the importance of arrival times when he emailed her on February 5, 2016, she is therefore entitled to this information.

Defendants' Response: Defendants contend that this information is overbroad and not calculated to lead to the discovery of admissible evidence. The defendant Williams initially responded that he would conduct a reasonable search for the requested documents, and he provided a summary of meeting attendance for various officials during the 2015-2016 season, including times that various officials arrived late or left early (Williams 00014-00015). Therefore, the defendants submit that this Interrogatory has been sufficiently answered.

Interrogatory No. 6: List of basketball officials that were assigned games with the Plaintiff for the past three (3) years.

Plaintiff's Motion: Plaintiff appears to claim that defendants failed to include co-officials on various dates because the printed form from the Arbiter website did not include another official or had a line with no name on various rows.

Defendants' Response: The defendants produced a print-out of all games and scrimmages assigned to plaintiff from 2013-2016 (Williams 00022-00032). The defendants do not have any other records of officials that were assigned games with the plaintiff on the dates in question, and the Defendants assume that the lines on the Arbiter form simply indicate that no other official was assigned.

Interrogatory No. 7: List of all school assignments for basketball games officiated by the plaintiff for the past three (3) years.

Plaintiff's Motion: The plaintiff appears to claim that defendants failed to include scrimmages for the 2013-2014 season.

Defendants' Response: The documents produced at Williams 00022-00032 include scrimmages.

Interrogatory No. 8: List of all organizations for which the plaintiff was assigned basketball games within the past three (3) years.

Plaintiff's Motion: The plaintiff appears to claim that defendants failed to specify the organizations for which the basketball games were officiated between 2013-2016.

Defendants' Response: The documents produced at Williams 00022-00032 include the names of the schools involved in the contests, which should indicate the "organizations" governing those contests. Additionally, the defendant Williams is providing a supplemental response regarding organizations for which the plaintiff was assigned basketball games.

Interrogatory No. 9: List of all officials assigned to work with the plaintiff for the past three (3) years.

Plaintiff's Motion: The plaintiff appears to claim that defendants failed to specify the officials assigned to work with plaintiff for basketball games she officiated between 2013-2016.

Defendants' Response: The documents produced at Williams 00022-00032 include the names of officials assigned to particular contests with the plaintiff.

Interrogatory No. 10: "Please provide the identity of the 'Someone' communicated in the email sent by E.A. Rico Williams on Friday, February 5, 2016, at 1:49 pm..."

Plaintiff's Motion: After recognizing that the defendant Williams answered the Interrogatory by providing the name of John Williams, the plaintiff now is seeking his ratings from 2013-2016.

Defendants' Response: The plaintiff is now seeking completely different information than that initially requested, and the proper avenue would be to serve a Supplemental Interrogatory. Nevertheless, Mr. Williams rating has already been provided in the documents produced at SCHSL 0022-0036.

Interrogatory No. 11: Backgrounds of individuals who were copied on the email from the defendant Williams to the plaintiff on February 5, 2016

Plaintiff's Motion: The plaintiff claims this information has not been provided.

Defendants' Response: The defendants object to the term "affiliations" as it is unclear as to what information the plaintiff is seeking. The defendant Williams has now produced the names, addresses, and email address of all Board members.

Interrogatory No. 12: Documentation of communication between the defendant Williams and Bob Whukowski and Kevin Brown that was referenced in the February 5, 2016 email

Plaintiff's Motion: It is unclear to the defendants what relief the plaintiff is seeking.

Defendants' Response: The defendant Williams responded in his discovery responses that no documentation existed because all communications were by telephone.

Interrogatory No. 13: Documentation of all schools that blocked the plaintiff from officiating contests in which they were involved.

Defendants' Response: This issue should be addressed by the SCHSL's Motion for a Protective Order.

Interrogatory No. 14: List of all District One basketball officials that also officiate football and volleyball.

Plaintiff's Motion: The plaintiff claims that defendants failed to specify the basketball officials that also officiate football and volleyball.

Defendants' Response: The documents produced at SCHSL 0037-0044 include all the sports that District One basketball officials are eligible to officiate. The various sports are designated by icons of a football, volleyball, etc., in the column titled "Eligibility."

Interrogatory No. 15: The information requested is duplicative of Interrogatory No. 5. Defendants also object to production of minutes of other Board meetings, as they are not relevant to any of the claims or issues in this case.

Interrogatory No. 16: Documentation and arrival times for the District One Board meeting on February 29, 2016

Plaintiff's Motion: The plaintiff seeks documentation and arrival times of the Board members for this meeting.

Defendants' Response: The defendant Williams has produced documentation of this meeting (Williams 00017) and has provided a Supplemental Response stating that arrival times were not documented.

Interrogatory No. 17: The information requested is duplicative of prior Interrogatories requesting documentation of officials who blocked the plaintiff, and this will be addressed by the SCHSL's Motion for a Protective Order.

Interrogatory No. 18: Documentation of fees collected by the SCHSL for coach ejections from 2013-2016

Plaintiff's Motion: It is unclear as to the plaintiff's argument as to why she is entitled to this information or why the SCHSL's response is insufficient.

Defendants' Response: The SCHSL responded that it does not maintain records of the total number of fees collected specifically for basketball coach ejections, and objected on the grounds that the Interrogatory was overbroad and irrelevant. The SCHSL further responded that there were thirty-three (33) basketball coach ejections from 2013-2016 and

provided the applicable range of fines for ejections. The defendants submit this Response is sufficient.

Request for Production No. 2: All photographs, documents, etc.

Plaintiff's Motion: The plaintiff simply states that she needs clarity with the communication from the defendant.

Defendants' Response: The plaintiff does not specify any deficiencies with the original Response.

Request for Production No. 4: Tax returns of the defendants.

Plaintiff's Motion: The plaintiff requests tax returns for a five-year period from both defendants.

Defendants' Response: The defendants maintain this information is overbroad and not calculated to lead to the discovery of admissible evidence. Further, the defendant SCHSL is a 501(c)(3) organization that is tax-exempt.

Upon information and belief, this concludes the areas of disagreement between the parties. As previously stated, the parties have tentatively scheduled a conference call for the day prior to the hearing to attempt to resolve as many disputes as possible.

DEPOSITION ISSUE

In the interest of judicial economy, the defendants seek guidance from the Court on an issue related to the defendants' attempt to depose the plaintiff. By letter dated October 7, 2016, counsel for the defendant Williams informed the plaintiff that the defendants would like to take her deposition. See Exhibit 1. From the beginning of this case, the plaintiff has maintained that she is not available before 3 p.m. for any court proceedings due to her employment as a middle school physical education teacher. The defendants informed the plaintiff that the deposition would need to start no later than 1 p.m. given the

travel time needed for the SCHSL's counsel, along with the fact that there is no time limitation for depositions under the South Carolina Rules of Civil Procedure. Instead of simply noticing the plaintiff's deposition before consulting her, counsel for the defendant Williams asked for her availability so that they deposition could be scheduled at a time that would be less disruptive to the plaintiff's daily schedule.

The plaintiff did not respond to the letter. Rather, she filed a document entitled "Objection to Proposed Deposition Testimony/Deposition" on October 21, 2016. See Exhibit 2. In this filing, the plaintiff stated she "is not available for scheduling in the near future to accommodate the League's counsel or Sarah Day Hurley for two hours starting no later than 1:00 p.m. with a no time limitation under the South Carolina Rules of Civil Procedure."

Counsel for the defendants would normally just notice the deposition of the plaintiff, but at this point, the defendants fear this will simply lead to another motion filed by the plaintiff, additional expense, and court time. Counsel for the defendants respectfully request that the court address this issue at the hearing scheduled for November 2, 2016.

CONCLUSION

For the reasons set forth above, the defendants respectfully request that the plaintiff's Motion to Compel be denied. Additionally, the defendants request the Court address the "Objection" filed by the plaintiff on October 21, 2016.

Respectfully submitted,

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: S / J. Michael Montgomery

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October 31, 2016

TURNER PADGET GRAHAM & LANEY, P.A.

By: S / Sarah Day Hurley

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Attorneys for Defendant, E.A. "Rico" Williams,
Director, District One S.C. Basketball Officials
Association

Greenville, South Carolina

October 31, 2016

(SCHSL) Letter from South Carolina High School League's Counsel to Plaintiff dated March 14, 2017,
Requesting Clarification on Plaintiff's Motion to Compel



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MICHAEL MONTGOMERY

DIRECT 803 231.7333 DIRECT FAX 803 231.7390

mmontgomery@sowellgray.com

March 14, 2017

Ms. Aminah A. Richburg
217 Plum Creek Lane
Greenville, South Carolina 29607

RE: Aminah A. Richburg v. E.A. "Rico" Williams, Director, District One S.C. Basketball
Officials Association, and the South Carolina High School League
Civil Action No.: 2016-CP-23-02113
Date of Loss: 2/2/16
IRF Claim No.: 74430
Our File No.: 5346/1536

Dear Aminah:

I hope you are doing well. In light of the roster meeting in front of Judge Gravely on March 9th, I wanted to take the opportunity to communicate with you about your pending Motion to Compel. I have reviewed your latest Motion to Compel dated January 13, 2017, as well as my prior discovery responses and correspondence with you, and I am hoping to get a better understanding of what information you are claiming you are entitled to but have not received from the South Carolina High School League.

First Set of Interrogatories

- No. 1: It is my understanding that the first and last names of the District One Board of Directors have been provided. Therefore, you are not seeking additional information pursuant to this Motion to Compel.
- No. 2: It does not appear that you are seeking additional information pursuant to this Motion to Compel.
- No. 3: It does not appear that you are seeking additional information pursuant to this Motion to Compel.
- No. 4: I previously responded to your motion via letter dated December 2, 2016. I have not received any response from you to my correspondence.

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MAIN 803 231.7400 FAX 803 231.7390

MEMBERSHIP FORMS AVAILABLE

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- No. 5: The South Carolina High School League asserts that this information is not calculated to lead to the discovery of admissible evidence and is overbroad. Additionally, we previously responded that the South Carolina High School League does not keep or maintain sign-in sheets or attendance sheets for meetings of the District One South Carolina Basketball Official's Association.
- No. 6: I previously responded to your motion via letter dated December 2, 2016. I have not received any response from you to my correspondence.
- No. 7: The South Carolina High School League previously responded that it does not have assignments for sub-varsity contests, as those would be maintained at the district level. Moreover, I would point out that you originally asked for assignments of basketball games, not scrimmages.
- No. 8: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 9: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 10: I would first note that the information you claim you are entitled to in your Motion to Compel was not the information you requested in the original Interrogatory. I previously responded to your inquiries about John Williams via letter dated December 2, 2016, and I informed you that this data is not maintained in the Arbiter system.
- No. 11: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 12: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 13: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 14: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.



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- No. 15: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 16: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 17: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 18: The SCHSL provided information about fines in its initial discovery responses, and I do not understand what additional information you are seeking.
- No. 19: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.

First Requests for Production

- No. 1: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 2: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 3: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 4: The SCHSL asserts this information is not relevant or calculated to lead to the discovery of admissible evidence. Additionally, I indicated to you in our phone conversation before the first scheduled hearing that the SCHSL is a tax-exempt organization.
- No. 5: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 6: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.



- No. 7: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.

Second Set of Interrogatories

- No. 1: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 2: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 3: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 4: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 5: The SCHSL stands by its objection and its prior response indicating that it does not have direct access to the information requested.
- No. 6: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 7: The SCHSL stands by its objection and its prior response indicating that it does not have direct access to the information requested.
- No. 8: The SCHSL stands by its objection and its prior response indicating that it does not have direct access to the information requested.
- No. 9: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 10: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 11: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.



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March 14, 2017
Page: 5

- No. 12: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 13: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 14: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.
- No. 15: It does not appear that you are seeking additional information from the South Carolina High School League pursuant to this Motion to Compel.

By going through these documents, I am trying to narrow down the areas where you claim information and documents have not been provided. If I have misunderstand your Motion, please let me know so I can be prepared to respond. It is certainly the SCHSL's position that your Motion to Compel does not affect the issues we have raised in our summary judgment motion, and therefore, we plan on going forward with our motion on March 20th. With warmest regards, I remain

Very truly yours,

J. Michael Montgomery

JMM:cnm

cc: Sarah Day Hurley, Esquire

(SCHSL) Letter from South Carolina High School League's Counsel to Plaintiff dated December 16, 2016,
Regarding Protective Order and Confidential Blocks

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----- Litigation is our Business. -----

MICHAEL MONTGOMERY

DIRECT 803 231.7833 DIRECT FAX 803 231.7890

m.montgomery@sowellgray.com

December 16, 2016

Ms. Aminah A. Richburg
217 Plum Creek Lane
Greenville, South Carolina 29607

RE: Aminah A. Richburg v. E.A. "Rico" Williams, Director, District One S.C. Basketball
Officials Association, and the South Carolina High School League
Civil Action No.: 2016-CP-23-02113
Date of Loss: 2/2/16
IRF Claim No.: 74430
Our File No.: 5346/1536

Dear Ms. Richburg:

I hope you are doing well, and I look forward to seeing you at your deposition on Wednesday, December 21st. I am enclosing a copy of the Protective Order that Judge Verdin entered in this case, as well as a copy of her Order denying your Motion to Dissolve, Terminate, or Cancel Defendant's Motion For a Protective Order. You may have already received them from the Court, but I am sending to you out of an abundance of caution.

Pursuant to the Protective Order that prevents disclosure of this information outside of this lawsuit, enclosed please find a list of officials and schools that have blocked you as of December 16, 2016 (Bates labeled 10-11). Additionally, the dates that the officials' blocks were entered are as follows:

1. Sigmund Arnold: October 8, 2016
2. Jess Davis: August 3, 2016
3. Harry Fay: July 24, 2016
4. Gary Hullinger: November 4, 2015
5. Max Massingille: July 30, 2016
6. Brandt Mills: July 12, 2016
7. Jerry Rackley: August 11, 2016
8. Joseph Richardson: January 2, 2016
9. Tim Sullivan: August 1, 2016
10. Brian Tillotson: July 13, 2016

I'd also like to explain that these names would not necessarily be the ones referenced in Mr. Williams' email of February 5, 2016, as these names have only been entered in the Arbiter system

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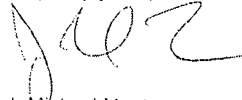
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used to schedule varsity contests. It is my understanding that the ten officials' blocks referenced by Mr. Williams in his email would have come from the Arbiter system used for sub-varsity contests. If any of the officials on Mr. Williams' list are the same as the officials on the SCHSL list, it would be because that official works both varsity and sub-varsity contests and has blocked you for both. Again, there is a different set of partner blocks for varsity contests and for sub-varsity contests. The list provided above would only apply to varsity contests.

With respect to the school blocks, the SCHSL enters blocks for the high school in the attendance area in which the official lives, along with the high school the official attended. Based on your application back in 2013, these blocks for Mauldin High School and Southside High School for varsity basketball contests were entered by Wynne Dee Cockfield at the SCHSL office. Again, this would only apply to varsity contests being assigned by Arbiter, and this information would not necessarily be accessible by Mr. Williams.

Please let me know if you have any additional questions or concerns. With warmest regards, I remain

Very truly yours,


J. Michael Montgomery

JMM:cnm

Enclosures

cc: Sarah Day Hurley, Esquire

(SCHSL) Letter from South Carolina High School League's Counsel to Plaintiff dated December 2, 2016,
Regarding Deposition and Discovery

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MICHAEL MONTGOMERY

DIRECT 803 231 7333 DIRECT FAX 803 231 7330

m.montgomery@sowellgray.com

December 2, 2016

Ms. Aminah A. Richburg
217 Plum Creek Lane
Greenville, South Carolina 29607

RE: Aminah A. Richburg v. E.A. "Rico" Williams, Director, District One S.C. Basketball
Officials Association; and the South Carolina High School League
Civil Action No.: 2016-CP-23-02113
Date of Loss: 2/2/16
IRF Claim No.: 74430
Our File No.: 5346/1536

Dear Ms. Richburg:

I hope you are doing well and had a nice Thanksgiving. Despite my efforts to speak with you before Thanksgiving, we were unable to connect so I wanted to follow up with you on a few items.

First, we need to reserve a date for your deposition in December. Based on the dates you provided, we would look to aim for Wednesday, December 21st at 10:00 a.m. If you will let me know as soon as possible whether you have a problem with that date, I would appreciate it. We will send out a deposition notice with the location in Greenville once we have confirmation from you. If I don't hear from you, I will assume that date and time works.

Secondly, we would still like to speak with you about any opportunities to resolve this case before additional time and costs are incurred by the parties. Please let us know if you would like to have that conversation.

Finally, I wanted to follow up regarding any information that we discussed prior to the Motion to Compel Hearing in early November. Based on my notes, I wanted to provide clarification on the following issues with respect to the SCHSL:

Interrogatory No. 3: We are still awaiting the Court's ruling on the Motion for the Protective Order. As soon as we get Judge Verdin's decision, we will respond accordingly. Additionally, the SCHSL is not in possession of any other documentation denoting plaintiff's participation in varsity scrimmages.

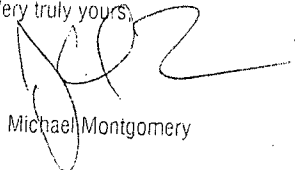
Interrogatory No. 4: You had asked for all ratings you had received from other partners from 2013-2016. While we disagree as to whether this information is discoverable, I have checked and the specific ratings provided between officials are not accessible by the SCHSL nor are they maintained in Arbiter. It is my understanding that Arbiter updates an official's overall rating as the season progresses based on the ratings provided by fellow officials, but there is no stored data for the specific rating given after every assignment.

Interrogatory No. 6: You had raised a question about the names of basketball officials assigned games with you that did not appear on the Arbiter printout produced as Williams 22-32. The SCHSL's access to the plaintiff's assignments through Arbiter contains the same designation as Williams 22-32, and the SCHSL is unaware of the reason for the designation on the Arbiter printout.

Interrogatory No. 10: You had requested all ratings between you and John Williams from 2013 and 2016. As explained above, this data is not accessible by the SCHSL through Arbiter.

Please let me know if you have any additional questions or concerns, and I look forward to hearing back from you. With warmest regards, I remain

Very truly yours,


J. Michael Montgomery

JMM:cnm

cc: Sarah-Day Hurley, Esquire

(SCHSL)Plaintiff Aminah A. Richburg's Errata Sheet Seeking to Change Testimony

Aminah A. Richburg Pro Se

217 PLUM CREEK LANE
GREENVILLE, SC 29607
(864) 419-6707

FEBRUARY 17, 2017

A WILLIAM ROBERTS, JR. & ASSOCIATES
234 SEVEN FARMS DR. SUITE 210
CHARLESTON, SC 29492

RE: RICHBRUG, AMINAH A. VS. WILLIAMS, E.A. "RICO", ET AL

TO WHOM IT MAY CONCERN:

I HAVE READ THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE GOVERNING THE READING AND SIGNING OF DEPOSITION TAKEN ON DECEMBER 21, 2016 IN THE ABOVE REFERENCED MATTER. I HAVE READ THE TRANSCRIPT AND CORRECTED ERRORS HAVE BEEN IDENTIFIED BY THE PAGE AND LINE NUMBER ON THE FULL SIZE SIGNATURE PAGE LOCATED AT THE END OF THE TRANSCRIPT AND THE REASONS ARE COMMUNICATED AS SUCH.

PAGE	LINE NUMBER	LINE	CHANGE	REASON
5		A. I DIDN'T GET THAT FROM YOU. THE ONLY 10:17:52 22 THING I RECEIVED WAS -- THIS IS WHAT I GOT.	THE ONLY THING I RECEIVED FROM YOU IS THE NOTICE OF THE DEPOSITION AND THE RULES GOVERNING THE DEPOSITION.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
14	18	OKAY, WHEN DID YOU STOP WORKING FOR GREENVILLE COUNTY SCHOOL SYSTEM	WHEN DID YOU START WORKING FOR GREENVILLE COUNTY SCHOOL SYSTEM?	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
31		A. I CAN'T REMEMBER THE YEAR. I DON'T 11:34:47 15 KNOW THE YEAR. LET'S SEE, MY SON WAS BORN IN 1988. 11:34:56 16 IT MAY BE 1990 -- IT COULD POSSIBLY BE '90 -- 11:35:09 17 BETWEEN '95 AND '97. 1995 AND 1997.	LET'S SEE, MY SON WAS BORN IN 1998.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
36		A. YOUR QUESTION IS WHAT I -- WHAT DID I	YOUR QUESTION IS, WHAT DID I DO TO BECOME AN OFFICIAL.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT

		11:43:03 11 HAVE TO DO TO BECOME --		WAS COMMUNICATED DURING THE DEPOSITION.
36		IN THE MEETINGS THEY POSTED THE DATE 11:43:30 15 WHEN THEY WOULD HAVE A STATE REPRESENTATIVE THAT 11:43:34 16 ADDRESSED THE DISTRICT 1 OFFICIALS. SO YOU HAD TO 11:43:41 17 ATTEND THAT MEETING. BOY, IT'S SO LONG AGO. AND 11:43:52 18 YOU HAD TO TAKE A TEST. AND THE TEST WAS YOU HAD TO 11:44:03 19 DRIVE TO COLUMBIA TO TAKE THE TEST FOR THE STATE 11:44:07 20 MEETING. SO ALL THE OFFICIALS FROM ALL OF THE 11:44:11 21 DISTRICTS WERE THERE, AND YOU WOULD TAKE THE TEST 11:44:14 22 THERE. THAT'S ALL I CAN RECALL AT THIS TIME.	IN THE MEETINGS THE DIRECTOR WOULD COMMUNICATE THE DATE WHEN THE STATE REPRESENTATIVES WOULD ADDRESS DISTRICT 1 OFFICIALS AT A MEETING IN COLUMBIA. THE OFFICIALS HAD TO ATTEND THAT MEETING. A TEST IS REQUIRED AT THE OFFICIALS MEETING IN COLUMBIA AND ALL OF THE OFFICIALS FROM ALL DISTRICTS ARE THERE.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
45		A. YEAH. IT WAS -- I'M JUST -- OH, YEAH. 11:55:50 19 I'M JUST QUOTING THE FACILITIES. A. I, YOU KNOW, I'M NOT THE BUSINESS 11:55:55 22 PERSON. IT'S HIS BUSINESS. A. SO, WHEN HE TELLS ME TO GO TO CERTAIN 11:55:59 25 SITES. THAT'S WHAT I AM --	IT WAS SEVERAL ORGANIZATIONS, I'M JUST QUOTING THE FACILITIES. I AM NOT THE BUSINESS PERSON, IT'S HIS BUSINESS. SO WHEN HE (RICO) TELLS ME TO GO TO CERTAIN SITES THAT'S WHAT I AM REFERRING TO.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		THAT'S WHAT I'M REFERRING		
47		11:58:04 13 A. YEAH. I THINK SO.	YES, I THINK SO.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
61		TO ME THAT'S LIKE AN AFFIRMATION TO 12:17:06 23 SAY THAT, YOU KNOW, I SEE YOU UP AND COMING, YOU 12:17:10 24 KNOW, YOU'RE A STRONG OFFICIAL AND THAT, YOU KNOW, 12:17:13 25 TO EVEN CONSIDER THAT. I DIDN'T ASK HIM. HE ASKED	TO ME THAT'S LIKE AN AFFIRMATION TO SAY THAT YOU ARE AN UPCOMING STRONG OFFICIAL AND I DID NOT CONSIDER PARTICIPATING ON A COMMITTEE, I DIDN'T ASK HIM, HE ASKED ME.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
63	11-15		ANOTHER DISTRICT MEETING, AND I MET WITH THE SCHL REPRESENTATIVE. I TOLD HIM THAT I NEEDED EVIDENCE THAT I ATTENDED THE MEETING BECAUSE I OFFICIATE IN DISTRICT 1. IN ORDER TO MEET THE REQUIREMENT I DROVE TO ROCK HILL	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
68		AND IT WAS -- HE PROBABLY WOULD NOT 12:24:55 3 REMEMBER ME BECAUSE IT WASN'T A CONTINUOUS TYPE OF 12:25:03 4 INTERACTION. IT'S JUST LIKE YOU CAN SAY, HOW COULD 12:25:08 5 I -- LET ME SEE, WHAT KIND OF EXAMPLE CAN I GIVE? 12:25:12 6 IT'S LIKE IF I WENT TO A SCHOOL BOARD MEETING, AND I	THE INTERACTION WAS NOT A CONTINUOUS TYPE OF INTERACTION AND HE PROBABLY WOULD NOT REMEMBER ME. LET ME SEE, WHAT EXAMPLE CAN I GIVE. IF I ATTENDED A SCHOOL BOARD MEETING AND I MET CRYSTAL BALL O-CONNOR AND I JUST MET HER, SHE DOES NOT KNOW ME, BUT I MET HER. SHE CAN'T RECALL THAT INTERACTION BECAUSE IT WASN'T CONTINUOUS. WE	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		12:25:23 7 MET CRYSTAL BALL O'CONNOR, BUT I JUST MET HER. SHE 12:25:27 8 REALLY DON'T KNOW ME, BUT I MET HER. SHE CAN'T 12:25:30 9 RECALL THAT INTERACTION BECAUSE IT WASN'T 12:25:32 10 CONTINUOUS. I WASN'T DEALING WITH A. YEAH, I DIDN'T EVEN, YOU KNOW, I JUST 12:25:52 20 SIGNED UP TO BECOME AN OFFICIAL. THE RATINGS AND 12:25:57 21 ALL OF THAT WAS NOT A BIG ISSUE FOR ME. 12:25:49	WERE NOT HAVING A MAJOR DISCUSSION. I DIDN'T EVEN KNOW ABOUT THE RATING SYSTEM. I JUST SIGNED UP TO BECOME AN OFFICIAL. THE RATINGS WAS NOT A BIG ISSUE FOR ME.	
69		A. NO. THE ONLY THING THAT IS DISCUSSED 12:26:22 6 IN THE MEETINGS, WE TALK ABOUT THE RULES, PREPARING 12:26:27 7 TO TAKE THE TESTING IN COLUMBIA. SO FROM TIME TO 12:26:34 8 TIME YOU MIGHT HAVE OFFICIALS THAT HAVE BEEN 12:26:38 9 OFFICIATING FOR THE PAST 20 YEARS OR MORE. THE 12:26:45 10 CREATOR OF THE BASKETBALL, EXCUSE ME, OFFICIALS	NO, THE ONLY THING THAT IS DISCUSSED IN THE MEETINGS ARE THE RULES AND PREPARATION FOR THE TEST IN COLUMBIA. FROM TIME TO TIME OFFICIALS THAT HAVE OFFICIATED FOR THE PAST TWENTY YEARS OR MORE WILL COMMUNICATE ITEMS THEY BELIEVE MAY BE ON THE TEST BASED ON PREVIOUS TEST FOR SEVERAL YEARS. THE STATE HAS USED THE SAME PERSON TO CREATE THE TEST FOR THE PAST TWENTY YEARS AND THE OFFICIALS WITH EXPERIENCE THAT HAVE COPIES OF PREVIOUS TEST WILL COMMUNICATE THAT	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

	12:26:50 11 ASSESSMENT, HE'S BEEN DOING IT THAT LONG. SO YOU 12:26:53 12 HAVE A LOT OF OFFICIALS WHO HAVE COPIES OF THOSE 12:26:57 13 TESTS. AND SO THEY WILL SHARE OR SORT OF GIVE WORD 12:27:02 14 TO SAY, YOU KNOW WHAT, WE'VE SEEN HIM USE THESE 12:27:05 15 QUESTIONS. IN THE PAST, LOOK FOR THIS, OR LOOK FOR 12:27:08 16 THAT, OR LOOK FOR THIS, OR LOOK FOR THAT. SO 12:27:11 17 GENERALLY THAT'S WHAT THEY -- THAT'S WHAT THEY 12:27:14 18 DISCUSS.	THEY HAVE SEEN THE CREATOR OF THE TEST USE THESE QUESTIONS BEFORE IN THE PAST. OFFICIALS ARE TOLD TO LOOK FOR THIS AND LOOK FOR THAT. SO GENERALLY THAT IS WHAT THEY DISCUSS.	
74	A. RIGHT. WHEN I RECEIVED ANOTHER. I 12:39:26 14 WAS AT WORK AND I WAS LIKE, WELL, YOU KNOW, HE'S 12:39:30 15 STILL CALLING, SO LET ME SEE WHAT'S GOING ON. 12:39:32 16 SO. AT THE TIME I CALLED HIM, AND 12:39:38 17 THAT'S WHEN YOU SEE THE -- AND TO BE FRANK WITH YOU, 12:39:44 18 I WOULD NOT SAY THAT THE CONVERSATION WENT THAT WAY 12:39:48 19 AND I DON'T EVEN REALLY	RIGHT, WHEN I RECEIVED ANOTHER MESSAGE FROM MR. WILLIAMS AND I PONDERED HE'S STILL CALLING SO I DECIDED TO CALL HIM FROM WORK TO FIND OUT WHAT HE WANTED AND TO BE FRANK WITH YOU THE CONVERSATION DID NOT GO THE WAY MR. WILLIAMS COMMUNICATED THAT IT DID AND I CANNOT RECALL EVERYTHING THAT WAS SAID BUT HE DID INITIATE THE CONVERSATION BY SAYING, YES, AMINAH REMEMBER I HAVE GAMES SCHEDULED FOR YOU AT FURMAN UNIVERSITY.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		RECALL EVERYTHING THAT WAS 12:39:52 20 SAID. BUT HE DID OPEN UP BY SAYING, YES, AMINAH. 12:39:56 21 REMEMBER I HAVE GAMES SCHEDULED FOR YOU AT FURMAN 12:40:01 22 UNIVERSITY.		
75		A. OKAY. THAT'S WHEN -- WHEN DURING THE 12:40:35 9 CONVERSATION WHEN HE REMINDED ME OF THE FURMAN 12:40:38 10 GAMES. AND I SAID, YES, I ACCEPTED THE GAMES AND I 12:40:42 11 COMMUNICATED -- THEN MR. WILLIAMS WENT ON TO SAY, 12:40:45 12 OH, AND BY THE WAY, SOMEONE TOLD ME. A. AND WHEN HE SAID SOMEONE TOLD ME, YOU 12:40:53 15 KNOW, I'M LIKE, OKAY. AND THEN - THEN WHEN HE SAID 12:41:00 16 THAT, I TOLD HIM THAT I DON'T WEAR OR OWN. AND SO I SAID, IS THAT ALL? BECAUSE, 12:41:08 21 YOU KNOW, I'M CALLING -- I'M TRYING TO ACCOMMODATE	OKAY, THAT'S WHEN MR. WILLIAMS INITIATED THE CONVERSATION BY SAYING, YES, AMINAH REMEMBER I HAVE GAMES SCHEDULED FOR YOU AT FURMAN UNIVERSITY AND I SAID YES, I HAD SENT YOU A MESSAGE PREVIOUSLY ACCEPTING IT AND I COMMUNICATED THAT I WOULD BE THERE FOR THE GAMES, THEN MR. WILLIAMS WENT ON TO SAY, OH AND BY THE WAY SOMEONE TOLD ME. WHEN HE SAID SOMEONE TOLD ME, I TOLD HIM THAT I DON'T OWN OR WEAR SWEAT PANTS. AND THEN I SAID, IS THAT ALL? (AN ENVIRONMENTAL SCENARIO AT THE TIME OF THE PHONE CALL WAS COMMUNICATED BY AMINAH RICHBURG TO THE INDIVIDUALS AT THE DEPOSITION, NOT TO MR. WILLIAMS - WHICH DESCRIBES THE EXTENT TO WHICH AMINAH RICHBURG	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		12:41:12 22 HIM. I'M ON THE JOB. I TEACH PHYSICAL EDUCATION. 12:41:16 23 I'VE GOT TO WALK TO THE LOCKER ROOM, I HAVE KIDS IN 12:41:19 24 THE GYMNASIUM, SO I MULTITASKING AT THAT PARTICULAR 12:41:22 25 POINT. THEN I THINK IF YOU GO BACK TO, WHAT IS IT,	ACCOMMODATED MR. WILLIAMS WITH THE CALL BUT WAS UNABLE TO HAVE A CONTINUOUS CONVERSATION BECAUSE SHE WAS ON THE JOB. AMINAH RICHBURG COMMUNICATED THAT SHE IS A PHYSICAL EDUCATION TEACHER AND DURING THE TIME OF HER CALL SHE WAS MONITORING STUDENTS THE LOCKER ROOMS AND THE GYMNASIUM	
76		A. THAT'S WHEN HE -- THE ONLY THING THAT 12:41:38 4 WAS DISCUSSED WAS, DO YOU HAVE A PROBLEM. AND THEN 12:41:45 5 I TOLD HIM AGAIN, I DON'T WEAR SWEAT PANTS OR 12:41:49 6 JOGGING PANTS OR WHATEVER THE THING WAS. I DON'T 12:41:53 7 OWN THAT.	WHEN I RESPONDED IS THAT ALL, THAT'S WHEN MR. WILLIAMS STATED DO I HAVE A PROBLEM AND THAT'S WHEN I TOLD HIM AGAIN, I DON'T OWN OR WEAR SWEAT PANTS.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
82		A. WHEN -- WHEN HE ASKED THE QUESTION OR 12:50:08 9 HE SAID THAT SOMEONE SAID THAT I WAS WEARING BLACK 12:50:12 10 SWEATPANTS AND I TOLD HIM I DON'T OWN OR WEAR -- SO. 12:50:18 11 I'M LETTING YOU KNOW THAT I JUST RESPONDED TO LET	WHEN MR. WILLIAMS SAID THAT SOMEONE SAID I WAS WEARING BLACK SWEAT PANTS AND I TOLD HIM, I DON'T OWN OR WEAR SWEAT PANTS. I'M LETTING YOU KNOW I RESPONDED TO LET HIM KNOW THAT I DON'T OWN OR WEAR SWEAT PANTS. SO, ANYTHING I WORE FOR ANY GAME CONTEST FELL UNDER THE BYLAWS OF THE OFFICIAL UNIFORM REQUIRED. THE BYLAWS STATE	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		12:50:21 12 HIM KNOW THAT I DON'T OWN OR WEAR. SO IF I DON'T 12:50:26 13 OWN OR WEAR, I'M LETTING HIM KNOW THAT I UNDERSTAND 12:50:31 14 THAT WEARING SOME SWEATPANTS IS -- HOW COULD I SAY 12:50:37 15 THIS? IF I DON'T OWN OR WEAR THEM, I DON'T OWN OR 12:50:41 16 WEAR THEM. SO, ANYTHING THAT I WORE FOR ANY GAME 12:50:46 17 CONTEST FELL UNDER THE BYLAWS IN TERMS OF THE 12:50:52 18 OFFICIAL UNIFORM REQUIRED. AND IN THE BYLAWS THE 12:50:57 19 UNIFORM REQUIRED IS A SHIRT AND BLACK TROUSERS.	THAT THE UNIFORM REQUIRED IS A SHIRT AND BLACK TROUSERS.	
83		12:51:24 3 A. YES. SO I RESPONDED. A. I RESPONDED TO HIS QUESTION. SO IF 12:51:33 6 YOU ASKED ME, AMINAH, DO YOU HAVE ON A RED HAT, YOU 12:51:38 7 WORE A RED HAT TO THE MEETING. TO THE DISPOSITION. 12:51:41 8 AND I SAID, I DON'T OWN OR WEAR A HAT, I ONLY WEAR 12:51:48 9 BLACK HATS. THAT'S MY FAVORITE COLOR SO I ONLY WEAR	I RESPONDED I RESPONDED. SO IF YOU ASKED ME, AMINAH DO YOU HAVE ON A RED HAT AND I WORE A BLACK HAT TO THE DEPOSITION, I WOULD TELL YOU, I ONLY WEAR BLACK HATS. BLACK IS MY FAVORITE COLOR SO I ONLY WEAR BLACK HATS. MR. WILLIAMS INITIATED THE HEARSAY FROM ANOTHER INDIVIDUAL, THIS SUPPOSED INDIVIDUAL OR THIS SOMEONE. I DON'T	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		12:51:51 10 BLACK HATS. SO, THAT'S WHAT I WAS COMMUNICATING TO 12:51:55 11 MR. WILLIAMS. SO, MR. WILLIAMS INITIATED THE 12:52:02 12 HEARSAY FROM ANOTHER INDIVIDUAL, THIS SUPPOSED 12:52:08 13 INDIVIDUAL OR THIS SOMEONE. BUT WHEN HE TALKED TO 12:52:12 14 ME I COMMUNICATED EXACTLY THE OPPOSITE. SO IF HE -- 12:52:16 15 YOU KNOW, THAT'S ON MR. WILLIAMS AND NOT ON ME.	KNOW IF HE TALKED TO ANYONE. THAT STATEMENT IS ON MR. WILLIAMS AND NOT ON ME.	
93		A. I THINK I MAY HAVE -- I THINK AT THAT 13:09:25 11 FIRST YEAR I SIGNED ONE. I THINK THE SECOND YEAR I 13:09:28 12 SIGNED ONE. BUT I DON'T -- BUT I DO KNOW THAT THAT 13:09:33 13 IS A PRACTICE. BUT THIS IS NOT MY SIGNATURE.	I THINK I MAY HAVE SIGNED ONE MY SECOND AND I MAY HAVE SIGNED ONE THE SECOND YEAR. I DON'T KNOW IF IT'S STILL A PRACTICE BUT THIS IS NOT MY SIGNATURE.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
94		A. AT THIS POINT I DON'T KNOW. I WAS NOT 13:11:02 22 -- THAT WAS NEVER DISCUSSED. WE ARE TOLD TO WEAR 13:11:07 23 BLACK TROUSERS. I PURCHASED THE SHIRT FROM THE 13:11:10 24 SOUTH CAROLINA HIGH	AT THIS POINT I DON'T KNOW, I WORE THE PROPER UNIFORM, THE PROFESSIONAL STANDARDS ARE NOT DISCUSSED AT MEETINGS. WE WERE TOLD WEAR BLACK TROUSERS. I PURCHASED THE SHIRT FROM THE VENDORS AT THE STATE SOUTH CAROLINA HIGH	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		SCHOOL LEAGUE. I PURCHASED THE 13:11:25 JACKET FROM THE SOUTH CAROLINA HIGH SCHOOL LEAGUE.	SCHOOL LEAGUE MEETING. I PURCHASED THE JACKET FROM THE VENDORS AT THE SOUTH CAROLINA HIGH SCHOOL LEAGUE MEETING.	
95		13:11:22 3 SO, I WOULD SAY IN TERMS OF 13:11:26 4 PROFESSIONAL STANDARDS, DOES IT CHANGE FROM YEAR TO 13:11:29 5 YEAR? SO, IN TERMS OF THE CONTRACT THAT'S SOMETHING 13:11:31 6 THEY WOULD HAVE TO DO WITH THE SOUTH CAROLINA HIGH 13:11:35 7 SCHOOL LEAGUE. A. YES. THAT'S SOMETHING -- SO, FOR ME, 13:11:40 11 I MEAN, IT HAS NO RELEVANCE WITH ME BECAUSE THERE'S 13:11:43 12 NOTHING THAT I CAN CONTROL WITH THAT.	SO, I WOULD SAY IN TERMS OF PROFESSIONAL STANDARDS, I WASN'T AWARE THAT IT CHANGED FROM YEAR TO YEAR. IN TERMS OF THE CONTRACT THAT WOULD FALL UNDER THE SOUTH CAROLINA HIGH SCHOOL LEAGUE THAT'S SOMETHING ELSE, THE BYLAWS OF THE BASKETBALL OFFICIALS ASSOCIATION, I HAVE NO CONTROL OF THAT AND HOW IT IS GOVERNED.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
100		PREVIOUS GAME TOLD HIM I HAD ON SWEATPANTS. THEN HE 13:18:33 2 ASKED IF I WORE SWEATPANTS AND I TOLD HIM I DO NOT 13:18:36 3 WEAR SWEATPANTS, IS THAT ALL. THEN MR. WILLIAMS	I TOLD HIM I DO NOT OWN OR WEAR SWEAT PANTS IS THAT ALL. THEN MR. WILLIAMS ASKED IF I HAD A PROBLEM WITH WHAT HE ASKED AND I REPEATED I DO NOT OWN OR WEAR SWEAT PANTS. IS THAT ALL, I'M AT WORK AND I NEED TO GET OFF THE	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		13:18:39 4 ASKED THE QUESTION, IF I HAD A PROBLEM DISCUSSING MY 13:18:42 5 SWEATPANTS. AND I REPEATED, I DO NOT WEAR SWEATS 13:18:45 6 PANTS. IS THAT ALL, BECAUSE I'M AT WORK AND I NEED 13:18:47 7 TO GET OFF THE PHONE. MR. WILLIAMS RESPONDED, FINE, 13:18:50 8 AND THE CONVERSATION ENDED --	PHONE. MR. WILLIAMS RESPONDED FINE AND THE CONVERSATION ENDED.	
101		A. I CAN'T AT THIS PARTICULAR TIME -- I 13:19:45 4 DON'T -- YOU KNOW, IN TERMS OF EVEN MAKING THAT 13:19:49 5 ARGUMENT, THAT'S ONE THAT I CAN'T MAKE IN TERMS OF 13:19:53 6 BECAUSE THAT'S SOMETHING FOR THE HIGH SCHOOL LEAGUE 13:19:55 7 REPRESENTATIVES. THEY ARE THE GATEKEEPERS. SO 13:20:00 8 THAT'S WHY I COMMUNICATED IT TO THEM FOR 13:20:03 9 ASSISTANCE -- A. -- TO GIVE ME THE FEEDBACK AS IF IT 13:20:09 12 WAS PROFESSIONAL OR NOT. SO I CAN'T SAY THAT	I CAN'T AT THIS PARTICULAR TIME MAKE THE ARGUMENT THAT THE CONVERSATION WAS UNPROFESSIONAL BECAUSE THAT'S SOMETHING FOR THE HIGH SCHOOL LEAGUE REPRESENTATIVES TO DETERMINE, THEY ARE THE GATEKEEPERS THAT IS WHY I COMMUNICATED AND ASKED THEM FOR ASSISTANCE. I ASKED THE REPRESENTATIVES OF THE SOUTH CAROLINA HIGH SCHOOL LEAGUE TO GIVE ME THE FEEDBACK IF THE BEHAVIOR WAS PROFESSIONAL OR NOT. I DO NOT KNOW THEIR ETHICS WITH DIRECTORS. THEY COULD POSSIBLE TELL A DIRECTOR IF YOU WANT TO CURSE	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		13:20:13 13 BECAUSE I DON'T KNOW, YOU KNOW. THEY COULD TELL HIM 13:20:17 14 AT THE SOUTH CAROLINA HIGH SCHOOL LEAGUE OFFICE IF 13:20:19 15 YOU WANT TO CURSE OUT AN OFFICIAL, THEY MAKE YOU MAD 13:20:22 16 OR WHATEVER, YOU CAN DO WHATEVER YOU WANT. I DON'T 13:20:24 17 KNOW WHAT KIND OF CONVERSATIONS. I DON'T KNOW WHAT 13:20:26 18 THE EXPECTATIONS ARE FOR DISTRICT DIRECTORS. THEY 13:20:30 19 DON'T SHARE THAT INFORMATION. SO, UNDER THE GUISE 13:20:33 20 OF THE ORGANIZATION THAT HE WORKS UNDER, I CAN'T 13:20:37 21 ANSWER THAT QUESTION.	OUT AN OFFICIAL IF THEY MAKE YOU MAD OR WHATEVER, THEY CAN DO WHATEVER THEY WANT. I DO NOT KNOW THE EXPECTATIONS OR CONVERSATIONS REGULATING THAT BEHAVIOR ARE FOR DISTRICT DIRECTORS. THE INFORMATION IS NOT SHARED WITH OFFICIALS SO UNDER THE GUISE OF THE ORGANIZATION I CAN'T ANSWER THAT QUESTION.	
105		A. SEVERAL MEMBERS OF THE BOARD IN THE 13:25:41 16 DISTRICT 1, THERE ARE SEVERAL. HE'S NOT THE ONLY 13:25:45 17 ONE. THERE ARE SEVERAL, SO...	SEVERAL MEMBERS OF THE BOARD IN THE DISTRICT ASSIGN GAMES OUTSIDE THE HIGH SCHOOL LEAGUE GAMES. HE'S NOT THE ONLY ONE.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
106		AREA, I CANNOT SPEAK ON IT BECAUSE, YOU KNOW, THAT 13:26:28 2 MIGHT BE THEIR ORDER OF	THERE WAS NO NEED TO ASK WHETHER THE PRACTICE IS APPROPRIATE IF THAT IS THE PRACTICE. I'M IN THE PRACTICE OF OFFICIATING AND I	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		BUSINESS. DON'T KNOW. A. THERE IS NO NEED FOR -- I MEAN, IF 13:26:47 8 THAT'S THE PRACTICE, THAT'S THE PRACTICE. SO, IF 13:26:53 9 I'M IN A PRACTICE OF OFFICIATING, I'M OFFICIATING 13:26:57 10 ACCORDING TO WHAT MY OTHER COLLEAGUES ARE DOING THAT 13:27:02 11 ARE OFFICIATING AS WELL.	AM OFFICIATING ACCORDING TO HOW MY COLLEAGUES ARE OFFICIATING AS WELL.	
108		A. YEAH. I JUST TAKE THAT HE 13:29:55 9 COMMUNICATED -- HE SAYS, "I COMMUNICATED YOUR TEXT 13:29:58 10 AND ABOVE TO SKIP LAX", WHICH IS OBVIOUS WITH THE 13:30:02 11 RECEIVERS OF THE TEXT. BUT THEN IT SAYS, "AND I 13:30:07 12 RECEIVED REQUESTED INFORMATION". 13:30:09 13 SO, WHY DID BOB -- THAT'S WHAT MY 13:30:13 14 QUESTION WAS, WHAT INFORMATION DID BOB WNUKOWSKI AND 13:30:17 15 KEVIN BROWN REQUEST?	I READ WHAT HE COMMUNICATED, I COMMUNICATED YOUR TEXT AND ABOVE TO SKIP LAX ALONG WITH OTHER RECEIVERS OF THE EMAIL. BUT THEN IT SAYS, AND I RECEIVED REQUESTED INFORMATION, SO MY QUESTION IS, WHAT INFORMATION DID BOB WNUKOWSKI AND KEVIN BROWN REQUEST.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
109		A. SO WHEN YOU SAID THAT I JUST --	SO WHEN YOU SAID THAT I JUST RECALLED MY INTERACTIONS WITH BOB	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED

				DURING THE DEPOSITION.
III		A. FOR SOME REASON HE STRESSED 13:33:36 17 VOLLEYBALL. I DON'T KNOW. BUT I'M SAYING IT WAS 13:33:42 18 NEVER AN ISSUE. THOSE MEETINGS ARE CONDUCTED DURING 13:33:45 19 THOSE SEASONS. A. SO BECAUSE THOSE MEETINGS ARE 13:33:48 22 CONDUCTED DURING THE SEASON FOR FOOTBALL AND 13:33:52 23 VOLLEYBALL --	NO, I'M SPEAKING IN TERMS OF BOTH, WHAT HE COMMUNICATED IN MEETINGS AND WHAT HE COMMUNICATED IN THE EMAIL. FOR SOME REASON HE STRESSED VOLLEYBALL, IT WAS NEVER AN ISSUE PREVIOUSLY AND THE BASKETBALL MEETINGS ARE CONDUCTED DURING FOOTBALL AND VOLLEYBALL SEASON.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
114		A. SO, YOU KNOW, WHEN YOU'RE A FIRST-YEAR 13:36:49 11 OFFICIAL AND WHEN YOU'RE A SECOND-YEAR OFFICIAL WHEN 13:36:52 12 IT COMES TO RATINGS AND ALL OF THOSE TYPE OF THINGS, 13:36:54 13 NONE OF THOSE THINGS ARE DISCUSSED. THAT WOULD BE 13:36:57 14 MORE WITH THE, I GUESS THE SEASON, THE SEASON 13:37:01 15 OFFICIAL. SO THAT WAS NOT...	WHEN YOU'RE A FIRST AND SECOND YEAR OFFICIAL RATING RATINGS ARE NOT DISCUSSED, THE SEASONED OFFICIALS ARE MORE CONCERNED WITH RATINGS.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
116		COULD MAKE THOSE FOUR MEETINGS. SO, IF YOU CHANGE A 13:38:52 2 MEETING DATE, THAT PRESENTED	A MEETING DATE WAS CHANGED THAT PRESENTED A CONFLICT. I MET THE REQUIREMENTS BECAUSE I RECEIVED GAMES THEREFORE I	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		A CONFLICT. BUT AT THE 13:38:58 3 BEGINNING OF INITIALLY BECOMING, I WOULDN'T SAY 13:39:05 4 CERTIFIED, BUT MEETING THE REQUIREMENTS, I RECEIVED 13:39:08 5 GAMES. SO RECEIVING GAMES MEANS THAT I MET THE 13:39:13 6 REQUIREMENTS. IF I DID NOT MEET THE REQUIREMENTS, 13:39:16 7 NO ONE COMMUNICATED THAT I DIDN'T. I DID NOT 13:39:20 8 RECEIVE A LETTER. I DID NOT RECEIVE A PHONE CALL 13:39:23 9 STATING YOU WILL NOT BE ABLE TO OFFICIATE THIS YEAR 13:39:28 10 DUE TO FAILURE TO DO A, B, C AND D. I DID NOT GET 13:39:33 11 THAT. NEVER RECEIVED ANY TYPE OF NOTIFICATION. NO 13:39:37 12 COMMUNICATION WHATSOEVER.	MET THE REQUIREMENT. IF I DID NOT MEET THE REQUIREMENTS, NO ONE COMMUNICATED THAT I DIDN'T. I DID NOT RECEIVE A LETTER. I DID NOT RECEIVE A PHONE CALL STATING THAT I WOULD NOT BE ABLE TO OFFICIATE THIS YEAR DUE TO A FAILURE OF MEETING THE REQUIREMENTS. NEVER RECEIVED ANY TYPE OF NOTIFICATION, NO COMMUNICATION WHATSOEVER.	
119		A. SO, YOU KNOW, YOU GOT THE LITTLE HERD, 13:43:25 22 YOU KNOW. SO YOU HAVE TO MAKE YOUR WAY IN. AND 13:43:28 23 WHEN THEY SAY, I SEE YOUR	THE OFFICIALS ARE LIKE A HERD RUSHING TOWARDS THE DIRECTOR. SO ONE WOULD HAVE TO MAKE THEMSELVES SEEN AND THE DIRECTOR WOULD RESPOND. I SEE YOUR FACE, THEN I WOULD	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		FACE, THEY DID GIVE YOU A	GET CREDIT FOR ATTENDANCE.	
		13:43:30 24 CHECK FOR ATTENDANCE.		
122		A. BUT THERE IS A POSSIBILITY. REMEMBER, 13:46:20 7 I AM A TEACHER, SO I'M NOT SITTING AT A DESK. I 13:46:24 8 TEACH PHYSICAL EDUCATION. SO, I'M ON THE MOVE. I 13:46:27 9 ONLY GO TO MY OFFICE TO RELIEVE MYSELF, YOU GET WHAT 13:46:31 10 I'M SAYING, CHECK ON THE GIRLS. SO I'M NOT A 13:46:33 11 TEACHER. WHEREAS IF SOMEONE SENDS AN EMAIL AND I'M 13:46:36 12 AT MY DESK OR I'M IN A CLASSROOM AND IT'S ACCESSIBLE 13:46:40 13 TO ME.	BUT THERE IS A POSSIBILITY. REMEMBER, I AM NOT A CLASSROOM TEACHER, SO I'M NOT SITTING AT A DESK. I TEACH PHYSICAL EDUCATION SO I'M ON THE MOVE. I ONLY GO TO MY OFFICE TO RELIEVE MYSELF. I'M NOT A CLASSROOM TEACHER WHEREAS IF SOMEONE SENDS ME AN EMAIL, I'M AT A DESK IN A CLASSROOM AND IT IS ACCESSIBLE TO ME.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
129		A. IT'S JUST LIKE IN A SCHOOL, TEACHERS 13:58:41 18 HAVE SOMEONE THAT'S VOTED IN AT THE BEGINNING OF THE 13:58:44 19 YEAR TO SERVE AS A LIAISON. IF THERE'S A PROBLEM IN 13:58:49 20 SCHOOL YOU HAVE A TEACHER'S REPRESENTATIVE.	IN A SCHOOL, TEACHERS VOTE FOR A TEACHER TO SERVE AS A TEACHER LIAISON. IF THERE IS A PROBLEM AT SCHOOL, YOU HAVE A TEACHER REPRESENTATIVE	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
135		A. I GOT THAT LETTER. AND THEN THATS 14:06:21 24 WHEN -- SO THAT WAS THE LAST CORRESPONDENCE IS WHEN	I GOT THE LETTER AND THAT WAS THE LAST CORRESPONDENCE.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		14:06:27 25 I RECEIVED IT IN A LETTER. SO I CORRESPONDED WITH		
142		A. WELL, AT THE TIME YOU HAD A LOT OF 14:12:58 7 REPRESENTATIVES THERE. SO I SAW SKIP LAX. I SAW 14:13:04 8 JEROME SINGLETON OR WHATEVER HIS NAME IS. I DON'T 14:13:07 9 KNOW WHAT JOEDY MOOTS EVEN LOOKS LIKE. AND THEN YOU 14:13:12 10 HAD MR. WILLIAMS HIMSELF AND A COUPLE OF OTHER 14:13:17 11 OFFICIALS. SO, IN LIGHT OF THE SITUATION, I DIDN'T 14:13:22 12 FEEL THAT THAT SETTING WAS APPROPRIATE	THERE WERE A LOT OF REPRESENTATIVES THERE, I SAW SKIP LAX, JEROME SINGLETON. I DON'T KNOW WHAT JOEDY MOOTS LOOKS LIKE, MR. WILLIAMS AND A COUPLE OF OTHER OFFICIALS. SO IN LIGHT OF THIS SITUATIONS I DIDN'T FEEL THAT THE SETTING WAS APPROPRIATE.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
148		A. FOR THIS UPCOMING -- MY STUDENTS AS I 14:21:34 7 SHARED WITH YOU EARLIER -- PETE JONES, WHO IS MY 14:21:37 8 PHYSICAL ED TEACHER AT SOUTHSIDE HIGH SCHOOL, HE 14:21:40 9 INTEGRATED THE CLASS WHERE HE ALLOWED US TO BE 14:21:44 10 OFFICIALS ON THE FLOOR. SO, WITH ME BEING A 14:21:48 11 PHYSICAL EDUCATION TEACHER, THAT'S A PART OF THE	FOR THIS UPCOMING SCHOOL YEAR MY STUDENTS HAVE NOTICED I DON'T HAVE VERY MANY GAMES AS I SHARED WITH YOU EARLIER PETE JONES WHO WAS MY PHYSICAL EDUCATION TEACHER AT SOUTHSIDE HIGH SCHOOL ALLOWED STUDENTS TO BE OFFICIALS DURING GAMES. I HAVE CONTINUED THE TRADITION WITH MY STUDENTS WITH THE SAME COMPONENT WITH 21ST CENTURY SKILLS THAT INVOLVE TEAMWORK AND ACCOUNTABILITY WHICH I INTEGRATE IN MY TEACHING	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		14:21:50 12 COMPONENT AS WELL. IT GOES WITH THE 21ST CENTURY 14:21:54 13 SKILLS WHERE YOU TALK ABOUT TEAMWORK. 14:21:55 14 ACCOUNTABILITY. THAT SORT OF THING. SO THAT'S A 14:21:59 15 PART OF MY CURRICULUM. MY STUDENTS DO THE SAME 14:22:02 16 THING BECAUSE I LET THEM KNOW THAT WHEN THEY TURN 14:22:04 17 18, THAT THEY CAN BECOME AN OFFICIAL. AND I SHARE 14:22:08 18 WITH THEM MY STORY THAT AS A STUDENT THAT'S HOW I 14:22:11 19 MADE MONEY, AND SO...	CURRICULUM. MY STUDENTS ARE GIVEN THE SAME OPPORTUNITIES BECAUSE I COMMUNICATE WITH THEM THAT THEY CAN BECOME AN OFFICIAL WHEN THEY BECOME EIGHTEEN AND I SHARE MY STORIES ON HOW I MADE MONEY AS A STUDENT	
150		A. YOU KNOW, THAT WOULD NOT BE FEASIBLE 14:23:58 16 FOR ME. ESPECIALLY WITH THE DISTANCE REQUIRED AND 14:24:03 17 THE TIME ON THE ROAD AND ALL OF THAT.	IT WOULD NOT BE FEASIBLE TO JOIN OTHER DISTRICTS ESPECIALLY WITH THE DISTANCE REQUIRED AND TIME ON THE ROAD.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.
151		A. AND SO MY GOAL WAS TO BECOME AN 14:25:47 18 ADMINISTRATOR AT THE MIDDLE SCHOOL LEVEL. 14:25:52 19 OFFICIATING	MY GOAL IS TO BECOME AN ADMINISTRATOR AT THE MIDDLE SCHOOL LEVEL. OFFICIATING BASKETBALL GIVES ME THE HIGHEST VISIBILITY. SEVERAL PRINCIPALS HAVE RECOGNIZED ME AT	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		BASKETBALL IS LIKE THE HIGHEST 14:25:55 20 VISIBILITY, SO EVEN TO ENTER AS AN ASSISTANT 14:25:59 21 PRINCIPAL, IF YOU KNOW, PRINCIPALS SEE ME AT THE 14:26:03 22 GAMES, AND I'VE HAD SEVERAL THAT HAVE RECOGNIZED ME. 14:26:08 23 SOME OF THEM, EVEN MY PEERS WHO HAVE BECOME 14:26:11 24 PRINCIPALS SINCE I WAS AN ASSISTANT PRINCIPAL AT THE 14:26:15 25 ELEMENTARY LEVEL THEY HAVE -- THEY MAY HAVE BEEN	GAMES AND SOME OF THEM ARE MY PEERS WHO HAVE BECOME PRINCIPALS SINCE I WAS AN ASSISTANT PRINCIPAL AT THE ELEMENTARY LEVEL.	
152		ASSISTANTS BACK THEN AND NOW THEY'RE PRINCIPALS. 14:26:20 2 SO, THE EYE WAS THERE. AND I'VE GOTTEN A LOT OF 14:26:26 3 FEEDBACK FROM A LOT OF THOSE ADMINISTRATORS. AND I 14:26:30 4 EVEN PUT IT OUT THERE THAT, HEY, YOU KNOW, I'M 14:26:33 5 CONSIDERING MAYBE LOOKING AT MIDDLE SCHOOL 14:26:35 6 ADMINISTRATION. I'VE BEEN WITH THE BABIES FOR A	THERE WERE A LOT OF PRINCIPALS THAT HAD THEIR EYE ON ME AND I RECEIVED A LOT OF FEEDBACK FROM THOSE ADMINISTRATORS. I WOULD COMMUNICATE THAT I WAS CONSIDERING MIDDLE SCHOOL ADMINISTRATION, SINCE I'VE BEEN WITH THE BABIES FOR A LONG TIME. GREENVILLE COUNTY SCHOOLS HAS SO MANY SCHOOLS SERVICED BY DISTRICT ONE, I'M OFFICIATING EVERY SCHOOL IN DIFFERENT REGIONS IN THE COUNTY AND I'M DOING IT FOR MORE THAN ONE SPORT AS WELL.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		14:26:38 7 LONG TIME, YOU KNOW, THAT TYPE OF TALK. A. SO, I WAS WITH DISTRICT 1 WITH 14:26:47 10 GREENVILLE COUNTY BEING SO BIG AND HAVING SO MANY 14:26:50 11 SCHOOLS, I'M HITTING POSSIBLY EVERY SCHOOL IN 14:26:55 12 DIFFERENT REGIONS IN THE COUNTY, WHICH MAKES ME VERY 14:27:00 13 VERY VISIBLE. AND I'M DOING IT FOR MORE THAN ONE 14:27:03 14 SPORT AS WELL.		
161		A. REMEMBER, WHEN I FIRST JOINED THE 14:44:07 17 ORGANIZATION UNDER MS. NORRIS, MR. WILLIAMS 14:44:10 18 APPROACHED ME BECAUSE HE OVERHEARD ME DISCUSSING MY 14:44:15 19 RATIONALE FOR OFFICIATING WHEN HE HEARD ME SHARING 14:44:19 20 THAT MY CHILDREN WERE AT CHRIST CHURCH. AND I'M A 14:44:21 21 TEACHER. AND, YOU KNOW, IT'S NOT FOR FREE. THEY 14:44:24 22 BASE IT ON MY INCOME. AND I	REMEMBER, WHEN I FIRST JOINED THE ORGANIZATION UNDER MS. NORRIS, MR. WILLIAMS APPROACHED ME BECAUSE HE OVERHEARD ME DISCUSSING MY RATIONALE FOR OFFICIATING WHEN HE HEARD ME SHARING THAT MY CHILDREN WERE A CHRIST CHURCH AND I AM AN EDUCATOR AND THE TUITION IS NOT FREE, IT'S BASED ON MY INCOME WHICH IS AVERAGED JUST LIKE A RICH PERSON'S INCOME BUT I HAVE A POOR INCOME. BUT IF YOU REALLY LOOK AT IT HOW IT BALANCES OUT ITS PRETTY MUCH THE SAME.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		TELL PEOPLE MY INCOME 14:44:27 23 IS LIKE A RICH PERSON'S INCOME BUT A POOR INCOME. 14:44:31,24 BUT IF YOU REALLY LOOK AT HOW IT BALANCES OUT, IT'S 14:44:34 25 THE SAME PRETTY MUCH.		
163		A. I'M GOING TO TELL YOU, WITH MY 14:45:59 7 AFFILIATION WITH THE SOUTH CAROLINA DISTRICT 1 14:46:03 8 BASKETBALL ASSOCIATION, WITH ME OFFICIATING GAMES, I 14:46:08 9 CAME IN CONTACT WITH -- IN ATTENDING THE MEETINGS 14:46:12 10 DOWN IN COLUMBIA, I MET TWO OFFICIALS BUT THEY'RE 14:46:18 11 NOT FROM THE GREENVILLE AREA, BUT THEY OFFICIATE FOR 14:46:24 12 THOSE TYPES OF GROUPS, AAU AND ALL OF THAT. SO, 14:46:28 13 WITH ME ATTENDING THOSE. THE BIG MEETINGS, IT SORT 14:46:36 14 OF EXPOSED ME TO OTHER OFFICIALS. AND WITH THOSE 14:46:40 15 OFFICIALS I WAS ABLE TO OFFICIATE TOURNAMENTS. AND	MY AFFILIATION WITH THE SOUTH CAROLINA DISTRICT 1 BASKETBALL ASSOCIATION AND OFFICIATING GAMES, ALLOWED ME TO COME IN CONTACT WITH OFFICIALS OUTSIDE THE GREENVILLE AREA BUT THEY OFFICIATE FOR ALL TYPES OF GROUPS. MY EXPOSURE TO OTHER OFFICIALS ENABLED ME TO OFFICIATE TOURNAMENTS FOR TWO YEARS. THE TOURNAMENTS DID NOT INVOLVE RICO WILLIAMS. ONE OF THE OFFICIALS GAVE ME A SCHEDULE OF ALL OF THE TOURNAMENTS CONDUCTED IN THE GREENVILLE AREA AND HE CONSIDERED MY PARTICIPATION BECAUSE I LIVE IN GREENVILLE, SO HE SENT ME THE INFORMATION AND ASKED ME TO CONTACT THE INDIVIDUALS THAT HAVE A LEADERSHIP ROLE WITH OFFICIATING IN THE ORGANIZATION	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		14:46:45 16 WITH THOSE TOURNAMENTS I DID THAT FOR TWO YEARS. 14:46:48 17 THAT WAS NOT WITH RICO WILLIAMS. 14:46:51 18 AND SO WITH ONE OF THE OFFICIALS, HE 14:46:57 19 GAVE ME AN OUTLINE OF ALL OF THE YBOA TOURNAMENTS 14:47:03 20 THAT WOULD BE IN THE GREENVILLE AREA BECAUSE HE'S 14:47:06 21 THINKING, AMINAH IS IN GREENVILLE, SHE WILL BE 14:47:09 22 PERFECT. AND SO I SENT -- HE SENT ME THE 14:47:12 23 INFORMATION AND ASKED ME TO CONTACT WHOEVER THESE 14:47:16 24 INDIVIDUALS ARE THAT HAVE THE LEADERSHIP ROLE WITH 14:47:22 25 OFFICIATING IN THE ORGANIZATION.		
170		A. NO. I TAKE MY NOTES FROM THE TWO OF 14:55:09 11 YOU. I JUST MIMIC WHAT YOU GUYS DO. THAT'S WHY I 14:55:20 12 WAS TRYING TO WRITE. IT'S LIKE THEY'RE WRITING. I'M	NO, I TAKE MY NOTES FROM THE TWO OF YOU. I JUST MIMIC WHAT YOU GUYS DO. ANYTHING THAT YOU WRITE AND SEND, I'M GOING TO WRITE IT TOO.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

		14:55:25 13 GOING TO WRITE TOO.		
172		A. NO, I HAVE NOT. 14:58:39 19 AND THE QUESTION PREVIOUSLY IS, HAVE I 14:58:42 20 EXPERIENCED IT BEFORE. YOU ASKED THE QUESTION IF 14:58:47 21 I'VE EVER BEEN MARRIED, HAVE I EVER BEEN DIVORCED. 14:58:51 22 SO, THAT WAS MY FIRST EXPERIENCE. SO, WITH THIS WAS 14:58:56 23 SORT OF LIKE A REHASH OF THAT EXPERIENCE. I NEED A 14:59:02 24 BREAK.	NO, I HAVE NOT, AND TO ANSWER YOUR PREVIOUS QUESTION, I HAVE EXPERIENCED ANXIETY BEFORE, IF I'VE EVER BEEN MARRIED OR DIVORCED. SO THAT WAS MY FIRST EXPERIENCE WITH ANXIETY AND THIS IS SORT OF A REHASH OF THAT EXPERIENCE. I NEED A BREAK.	THE TRANSCRIPT DID NOT ACCURATELY INTERPRET WHAT WAS COMMUNICATED DURING THE DEPOSITION.

(Williams) Defendant William's Supplemental Answers to Plaintiff's First Set of Continuing Interrogatories

dated September 29, 2016

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE) Civil Action No. 2016-CP-23-02113

AMINAH A. RICHBURG,)

Plaintiff,)

vs.)

E.A. "RICO" WILLIAMS, DIRECTOR)
DISTRICT ONE SC BASKETBALL)
OFFICIALS ASSOCIATION AND THE)
SOUTH CAROLINA HIGH SCHOOL)
LEAGUE,)

Defendants.)

**DEFENDANT'S SUPPLEMENTAL
ANSWERS TO PLAINTIFF'S FIRST SET
OF CONTINUING INTERROGATORIES**

TO: AMINAH RICHBURG, PRO SE, THE ABOVE-NAMED PLAINTIFF:

Defendant E.A. "Rico" Williams ("Defendant") herein supplements his responses to Plaintiff's First Set of Continuing Interrogatories pursuant to Rule 33 of the South Carolina Rules of Civil Procedure. Defendant repeats and reasserts herein all objections previously raised in response to Plaintiff's First Set of Continuing Interrogatories.

INTERROGATORIES

19. Provide background of individuals, names and affiliations of all persons that received the communication sent by E.A. "Rico" Williams on February 5, 2016 at 1:49 pm.

RESPONSE: Defendant objects to this request on the grounds that it is overly broad, and also vague to the extent it seeks the "affiliations" of such individuals. Subject to and without waiving this objection, Defendant will supplement this response with a list of the SCBOA Board members and their addresses, to the extent known.

SUPPLEMENTAL RESPONSE: Below is a list of the names associated with the email addresses shown in an email dated February 5, 2016:

skip@schsl.org - Skip Lax
albanister77@gmail.com - Al Bannister
audreycox94@yahoo.com - Audrey Cox
proump1@netzero.net - Bob Wnukowski
Ddpaulos@bellsouth.net - David Dendy
hullingerge@yahoo.com - Gary Hullinger
JMeekins@greenvillecounty.org - James Meekins
ken@kenplanda.com - Ken Pelanda
MRRREF12@charter.net - Kevin Brown
mailforst@bellsouth.net - Steward Lawrence

TURNER PADGET GRAHAM & LANEY, P.A.

August 29, 2016

By: Sarah Day Hurley
Sarah Day Hurley (S.C. Bar #16241)
Post Office Box 1509
200 East Broad Street, Suite 250
Greenville, South Carolina 29602
Telephone: 864-552-4651
Facsimile: 864-282-5965
E-mail: shurley@turnerpadget.com

Attorney for Defendant "Rico" William

Name	31-Aug-15	14-Sep-15	21-Sep-15	28-Sep-15	5-Oct-15	19-Oct-15	26-Oct-15	2-Nov-15	9-Nov-15	11-Jan-15
Double Single										
Double										
Single										
	****			****			****		****	
		****		****	****	****	****	****	****	****
	****		****			****		****	****	****
	****		****			****		****	****	****
	****					****	****	****		
						****	****	****		

Copied from the Attendance spreadsheet for SCBOA District #1 for 2015/2016 season.
 Each Official is marked as in attendance with the **** mark for the dates detailed. Blank Cell indicates Absent for that date.
 The cells identified with the Red Triangles in the upper right corner have comments attached to the cell as detailed below:

WILLIAMS

- Joe Elmer: 21 Sept-SCHSL Volleyball Match Assignment
- Gordon Greer: 31 Aug-Left Early @ 7:00 Personal; 21 Sept-Left Early @ 7:45 Personal; 19 Oct- SCHSL Volleyball Match Assignment
- Aminah Richburg: 21 Sept- Arrived Late to Mtg @ 7:35; 19 Oct- Arrived Late to Mtg @ 7:05
- Bob Wnukowski: 12 Oct- Left Early @ 7:10 Personal

K. N. Brown 8/26/16

Kevin N. Brown SCBOA District #1 Secretary/Treasurer

SOUTH CAROLINA HIGH SCHOOL LEAGUE

OFFICERS

Mickey Pringle, President
Dan Matthews, Vice President
Jerome Singleton, Commissioner

EXECUTIVE COMMITTEE

Mickey Pringle	President
Dan Matthews	Vice President
Dee Christopher	Past President
Ozzie Ahl (Term expires 2017)	AAAAA
Dr. Charles Burry (Term expires 2013)	AAAA
Robby Roach (Term expires 2019)	AAA
Sam Tuten (Term expires 2020)	AA
Shawn Johnson (Term expires 2020)	A
Ryan Brown (Ongoing Term)	State Department of Education
Dr. Steve Wilson (Term expires 2020)	Superintendents Association
Maureen Tiller (Term expires 2020)	Principals Association
Dr. Kathy Coleman (Term expires 2019)	School Boards Association
Bob Hayes (Term expires 2013)	Coaches Association
Penny Atkinson (Term expires 2020)	Associate Member
Sam Jones (Term expires 2020)	Officials Association
Joe Quigley (Term expires 2020)	Athletic Administrators Association
Dr. Akil Ross (Term expires 2018)	Member At Large
Edmond Burnes (Term expires 2017)	Member At Large
Patrick Finneran (Term expires 2017)	Member At Large
Dr. Tiniece Jarvis (Term expires 2013)	Member At Large

STAFF

Jerome P. Singleton	Commissioner
Nessie Harris	Associate Commissioner
Skip Lax	Associate Commissioner
Charlie Wentzky	Assistant Commissioner
Amy Booser	Assistant Commissioner
Dru M. Nix	Finance & Benefits Officer
Tammie Newman	Director of Communications & Public Relations
Blair Warren	Administrative Assistant
LaVonda Toatley	Administrative Assistant
Wynne Dee Cockfield	Assigning Secretary
Jan Hogan	Director of Technology & Media

121 Westpark Boulevard, Columbia, SC 29210.
P.O. Box 211575, 29221-6575
Telephone: 803-798-0120. Fax: 803-731-9679.
www.schsl.org schsl@schsl.org

OFFICE HOURS

June 1 - July 31 (Monday-Thursday)	7:30 am to 4:00 pm
August 1 - May 31 (Monday - Friday)	7:30 am to 4:00 pm

THE LEAGUE OFFICE WILL BE CLOSED FOR:

Labor Day	September 5, 2013
Thanksgiving	November 23 - 25, 2013
Winter Break	December 19 - January 1, 2014
Martin Luther King, Jr. Day	January 16, 2014
President's Day	February 20, 2014
Spring Break	April 12-17 & 21, 2014
Memorial Day	May 29, 2014
Independence Day	June 29 - July 4, 2014

PAST OFFICERS

Presidents

1913-16 R.C. Burs	1942-43 W.R. Anderson	1966-67 E.L. Stockman	1993-94 W. M. Turner
1916-17 D.T. Kinard	1943-44 H.A. Marshall	1967-68 J.O. Willis	1994-95 Phil Flynn
1917-19 H.T. Shockley	1944-45 I.B. Lever	1968-69 J.D. Parker	1995-96 Earl Lovelace
1919-21 W.C. Taylor	1945-46 R.C. Lake	1969-70 L.F. Sneath	1996-97 Danny Atkins
1921-23 R.C. Burs	1946-47 J.C. Doggett	1970-71 J.H. Nesbitt	1997-98 Wayne Flowers
1923-24 H.T. Shockley	1947-48 J.H. Coleman	1971-72 L.R. Kirk	1998-99 John Anderson
1924-25 A.C. Flora	1948-49 C.W. Shealy	1972-73 S.H. Baggett	1999-00 Allie Brooks
1925-26 L.L. Wright	1949-50 C.B. Busbee	1973-74 G.C. Cole, Jr.	2000-01 Tracy Carter
1926-27 J.H. Spann	1950-51 H.B. Batchman	1974-75 G.W. Seaborn	2001-02 Craig Tyler
1927-28 M.E. Brockman	1951-52 C.F. Reames	1975-76 A.O. Clark	2002-03 Marie Tiller
1928-29 A.J. Thackston	1952-53 C.D. Joyner	1976-77 S.H. Baggett	2003-04 Tara Dean
1929-30 T.C. Jolly, Jr.	1953-54 H.L. Sneed, Jr.	1977-78 J.C. Goodwin	2004-05 Jim Barry
1930-31 J.C. Hungerpillar	1954-55 H.T. Stoddard	1978-79 B.R. Ward	2005-06 Keith Bridges
1931-32 C.K. Wright	1955-56 S.M. Rice	1980-81 W.M. Turner	2006-07 Ted Greene
1932-33 E.R. Crow	1956-57 S.M. Kirk	1981-82 H.C. Starnes	2007-08 Henry Adair
1933-34 V.S. Goodyear	1957-58 R.P. Wilder	1982-83 W.D. Hucks	2008-09 Skip Lex
1934-35 W.M. Albergotti	1958-59 J.H. Lyles	1983-84 S.B. Creel	2009-10 Marion Lawson
1935-36 C.B. Seaborn	1959-60 J.E. Bethea	1984-85 T.F. Moore	2010-11 Lynn Cary
1936-37 O.B. Cannon	1960-61 W.C. Hawkins	1985-86 W.L. Varner	2011-12 Joe Keenan
1937-38 M.G. Patton	1961-62 F.E. DuBoise	1986-87 E.P. Clyburn, Jr.	2012-13 Paul Anderson
1938-39 R.O. Derrick	1962-63 J.C. Boozer	1987-88 R.L. Small	2013-14 Marion Waters
1939-40 J.G. Richards, Jr.	1963-64 M.W. Breland	1988-89 H.K. Dinkins	2014-15 Judd Starling
1940-41 T.B. Stevenson	1964-65 L.F. Arant	1989-90 W.L. Varner	2015-16 Dae Christopher
1941-42 P.H. Hobson	1965-66 V.E. Smith	1991-92 J.L. Moncrief	
		1992-93 L. Tracy Carter	

SECRETARY-TREASURERS

1913-15 J.B. Coleman
1915-23 M.E. Brockman
1923-32 J.D. Fulp
1932-43 C.M. Lockwood

EXECUTIVE SECRETARIES

1948-54 Ernest W. Stokes
1954-65 Lawrence B. Graves

TREASURER

1948-65 C. M. Lockwood

EXECUTIVE SECRETARY-TREASURER

1965-80 Lawrence B. Graves

EXECUTIVE DIRECTORS

1980-85 Jim Pinkerton
1986-98 H. A. Pato Ayoub
1998-05 Ronnie Matthews
2005-07 Jerome Singleton

COMMISSIONER

2007- Jerome Singleton

COMMITTEES ON ORGANIZATION

1913 Organization

R. C. Burs	Dr. H. H. Calhoun
F. E. Schofield	

1921 Reorganization

Dr. Reed Smith	R. C. Burs
W. C. Taylor	M. E. Brockman
H. Y. Stockley	

1931 Reorganization

C. K. Wright	J. G. Kelly
J. D. Fulp	C. M. Lockwood
A. J. Thackston	Y. L. Wright
E. M. McCowan	

1948 Reorganization

C. W. Shealy	J. K. McCown
C. B. Busbee	H. T. Stoddard
C. M. Lockwood	H. Hedgepath
J. C. Brice	H. F. Wright
W. H. Ward	

1969 Merger

A. M. Anderson	J. W. Lindsay
G. A. Anderson	H. C. Mitchell
M. D. Bogan	J. D. Parker
K. C. Hanna	E. L. Stockman
R. E. Howard	J. O. Willis

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EXECUTIVE COMMITTEE

R. C. Burts (1920-21, 25-26, 32-34)	D. C. Carmichael (1931-32)	A. O. Jones, Jr. (1940-42)
M. E. Brockman (1920-22, 26-28)	J. B. Bushardt (1931-34)	M. B. Carfax (1940-41)
M. E. Brockman (1920-22, 26-28)	T. B. Stevenson (1931-41)	H. D. Lewis (1940-42)
J. H. Witherspoon (1920-21)	E. R. Crow (1932-33)	F. DeVere Smith (1940-44)
W. C. Taylor (1920-27)	S. E. Johnson (1932-33)	F. J. Suhrstedt (1940-42, 47-48)
A. C. Flora (1920-29)	V. S. Goodyear (1932-34)	P. K. Harmon (1941-42, 46-47)
S. W. Carwile (1920-22, 28-29)	L. B. McCormick (1932-33, 44-45)	J. O. Willis (1941-45, 59-64, 66-69)
H. T. Shockley (1920-23)	W. M. Albergotti (1933-35)	D. M. McNaull (1941-42)
S. H. Edmunds (1921-29)	J. K. Derrick (1933-34)	A. J. Richards (1941-42)
H. C. Davis (1920-22)	J. W. Ballentine (1933-34)	J. M. Cherry (1941-42)
Dr. Reed Smith (1920-22)	C. M. McTeer (1933-34)	C. C. Stewart (1941-42)
L. J. Jenkins (1921-22)	B. F. Carmichael (1933-34, 45-46)	H. A. Marshall (1941-44)
J. D. Fulp (1922-32)	W. R. Anderson, Jr. (1934-35, 41-42)	G. D. Pryor (1943-44)
H. E. Jervey (1923-24)	G. C. Gaskin (1934-35)	O. K. McDaniel (1943-44)
L. L. Wright (1923-27)	Pat Hobson (1934-35, 39-42)	J. J. Godbold (1943-44)
T. L. Hanna (1923-24)	C. B. Seaborn (1934-36, 45-46)	W. C. Henderson (1943-44)
C. T. Howard (1923-24)	E. H. Davis (1934-37)	A. R. Hafner (1943-44)
B. L. Parkinson (1923-27)	B. S. Pinson (1935-36, 43-44)	T. C. Bruce (1943-48)
W. F. Warren (1924-25)	M. A. Carson (1935-37)	J. V. Martin (1943-45)
J. H. Thornwell (1924-25)	E. W. Rushton (1935-36)	L. D. Jones (1943-47)
John W. Moore (1924-25)	J. S. Agnew (1935-37)	J. C. Brice (1948-54)
C. M. Lockwood (1924-25, 32-65)	R. C. Lake (1935-36, 38-40, 44-46)	Harry Hedgepath (1948-65)
W. M. Scott (1924-28)	W. C. Sullivan (1935-36)	L. F. Arant (1948-65)
W. E. Black (1924-25)	F. E. DuBose (1935-37, 45-47, 58-62)	H. B. Batchman (1949-51)
S. M. Derrick (1924-27)	M. F. Hawthorne (1936-37)	L. G. Barre (1944-45)
J. K. McCown (1925-28, 39-39, 43-56)	E. S. Bennett (1936-37)	P. E. Gravely (1944-45)
L. N. Foy (1925-28)	M. M. Player (1936-41)	L. D. Richardson (1944-45)
W. H. McNairy (1925-27)	M. G. Patton (1936-38, 40-42)	H. F. Higbe (1944-45)
T. C. Jolly, Jr. (1925-26, 32-33)	E. B. Stoudemire (1936-38)	H. M. Kolb (1944-45)
Edmund Wroe (1925-28)	Philip T. Kelly (1937-38)	L. E. McLaurin (1944-46)
W. L. Pritchard (1925-29)	E. H. Hall (1937-38)	T. D. Stillwell (1945-46)
Dr. G. A. Wauchope (1925-26)	C. I. Chipley (1937-38)	M. T. Sloan (1945-46)
Dr. E. L. Green (1925-26)	J. P. Truluck (1937-39, 44-45)	C. L. Anderson (1945-46)
J. H. Spann (1926-32)	C. A. Timbes (1937-38, 43-44)	L. B. Ertle (1945-46)
W. H. Waro (1926-27, 43-57)	C. A. Byrd (1937-38)	H. S. Floyd (1945-46)
J. E. Hankins (1926-27)	W. I. Drummond (1937-38)	J. G. Long (1945-46)
Vernon Cook (1926-27)	J. B. Gentry, Jr. (1937-38)	J. D. Doggette (1945-47)
A. J. Thackston (1927-29)	W. E. Monts (1937-38)	J. F. Alliston (1945-56)
E. M. McCown (1927-32)	H. S. Bryan (1937-38)	E. L. Wright (1946-47)
C. C. Fishburne, Jr. (1927-23)	R. O. Derrick (1937-39)	D. E. Burnette (1946-47)
Isabel Watkins (1927-29)	J. E. Millard (1939-40)	C. A. Dixon (1946-47)
E. M. Smith (1928-29)	Wilbur McCown (1939-40)	H. A. Loftis (1946-47)
W. W. Benson (1928-29)	J. B. Reynolds (1939-40)	J. R. Lynn, Jr. (1946-47)
C. K. Wright (1928-32)	L. H. Curry (1939-40)	G. P. Crowell (1946-47)
J. T. McDaniel (1928-29)	R. A. Riggins (1939-41)	C. C. Garis (1946-48)
Guy Hill (1928-29)	C. J. Martin (1939-41)	Edward Stillwell (1946-48)
J. H. Coleman (1931-35, 45-48)	John G. Richards (1939-41)	L. E. Gable (1947-48)
O. B. Cannon (1931-32, 36-38)	I. B. Lever (1939-45)	E. C. Secnrich, Jr. (1947-48)
S. N. Lott (1931-35)	W. F. Mobley (1939-45)	H. F. Garis (1947-48)
W. G. Hynds (1931-32)	H. M. Henry (1940-41)	C. E. Williams (1947-48)

EXECUTIVE COMMITTEE

T. P. Wright (1947-48)	Gordon C. Cole, Jr. (1972-75)	H. Kenneth Dinkins (1984-91)
Paul Beam (1947-48)	James R. Neely (1972-73)	Tommy Lavelle (1986-90)
C. B. Busbee (1947-50)	W. R. Meriwether (1972-73)	James Gallman (1988-89)
C. W. Shealy (1948-49)	Paul R. Stephens (1973-77)	R. Lephon Small (1987-90)
H. T. Stoddard (1948-55)	George W. Seaborn (1973-76)	Ray Geddings (1987-90)
C. F. Reames (1950-52)	Willie Varner (1973-79, 85-88, 89-92)	Joseph D. Delaney (1987-89)
C. D. Joyner (1951-53, 57-61-79)	C. C. Daley (1973-75)	J. R. Fitzpatrick (1987-93)
H. L. Snead (1952-54)	Allen O. Clark (1974-77)	Danny E. Atkins (1988-92, 95-97)
W. R. Price (1954-56)	W. M. Turner (1974-78, 80-83, 92-95)	W. Reed Swann (1987-89, 93-97)
S. M. Rice (1954-57)	Paul Chapman (1974-78)	John M. Lison (1988-91)
G. W. McCown (1955-57)	B. J. Skelton (1975-79)	Mary P. Seamon (1988-90)
F. M. Kirk (1955-57)	Alfred McGinnis (1975-77)	S.O. Owens (1988-92, 96-00)
J. H. Lyles (1956-59)	Dan F. Williamson (1975-76, 80-84)	Earl Lovelace (1989-93, 94-97)
J. E. Bethea (1956-60)	B. F. Prosser (1976-80)	Allie E. Brooks (1989-96, 98-01)
J. C. Hatchett (1956-58)	Charles L. Cummings, Jr. (1976-80)	Alfonso Lamback (1989-95)
R. P. Wilder (1956-58)	Weldon D. Waites (1976-80)	Harriet S. Blanton (1989-95)
J. K. Blum (1957-59)	Evans E. Proctor (1977-80)	Barry Whitman (1989-95)
W. C. Hawkins (1947-61, 64-68)	W. D. Hucks (1977-81, 82-85)	James L. Moncrief (1990-93)
W. E. Smith (1957-66)	Wayne Whiteside (1977-81)	Paul T. Rawl (1990-94)
L. S. Fleniken (1958-61, 65-66, 76-79)	J. Coke Goodwin (1978-81)	R. Shell Dula (1990-94)
J. G. Boozer (1960-63)	Pete Ayoub (1978-80)	Henry C. Young (1990-95)
M. W. Breland (1961-64)	Keith Richardson (1978-82)	James A. Littlefield (1991-96)
K. C. Hanna (1961-67)	James A. Pitts (1978-82)	Billy Ammons (1992-96)
Ellis L. Stockman (1961-66)	Linda E. White (1978-79)	Dwayne Howell (1992-96)
Joe D. Parker (1962-70, 71-76)	Cal R. Burleson (1979-83)	R. C. Hicks (1992-96)
John F. Mabry (1963-64)	Bill R. Ward (1979-82)	Phil Flynn (1993-96, 99-03)
H. F. Wright (1964-65)	Brooks Brown III (1979-82)	Joe H. Bedenbaugh (1993-95)
W. S. Parrish (1964-72)	Stanley B. Creel (1979-82, 83-86)	James W. Jordan (1993-97)
Harold Schreiner (1964-79)	Alfred T. Butler (1979-81)	Russ Bedenbaugh (1994-02)
J. L. Wertz (1965-70)	Marilyn K. Hendrix (1980-82, 99-01)	Michael R. Gaskin (1994-98)
Phil Clark (1965-66)	T. E. C. Dowling (1980-82, 83-87)	Johnny Roscoe (1994-98)
J. B. Ouzts (1966-71)	Joseph E. Gentry (1980-84)	Gregory L. Cantrell (1994-98)
John W. Lindsay (1966-70)	H. C. Starnes (1981-84)	Doug Atkins (1995-99)
H. M. Lowder (1967-72)	Bobby Matthews (1981-85)	Gerald Witt (1995-01)
Wade Corn (1967-68)	Ernest Clyburn, Jr. (1981-89)	Joan Allen (1995-99)
Luther F. Shealy (1968-71)	Arthur Pinckney (1981-83)	Leroy Rainbow (1995-99)
Thad Ott (1968-69)	Charles D. Stoudemire (1982-83)	Jo Hecker (1995-99)
Arthur Taylor (1968-74)	Calvin Cooper (1982-87)	Ray Wilson (1996-1997)
J. H. Nesbitt (1969-72)	John Weathers (1982-86)	Wayne Flowers (1996-99)
A. M. Anderson (1969-72)	M. Webber Rowell (1982-87)	Roy Holloway (1996-00)
E. J. Davis (1969-72)	Charles Parnell (1982-86)	John Carlisle (1997-00)
E. M. Henry (1969-72)	Lynda F. Davis (1983-84)	John Anderson (1997-00)
R. E. Howard (1969-72)	Maurice Waddell (1983-85)	Barry Bolen (1997-01)
F. B. Walker (1969-72, 74-78)	Thomas F. Moore (1984-87)	Bernard McDaniel (1998-07, 08-11)
Jack Miller (1969-70)	Tracy Carter (84-88, 91-94, 96-02, 04-07)	David Corley (1998-01)
Roger Kirk (1970-73)	J. Lee McCormick (1984-85)	Charlie Macaluso (1998-02)
Claude Howe (1970-74)	W. H. Bouknight (1984-88)	Ron Taylor (1999-00)
W. A. Carr (1970-71)	J. Chester Floyd (1985-88)	Ralph Schmidt (1999-00)
Edward Burmester (1970-72)	Karl Fulmer (1985-86)	Creig Tyler (2000-03, 07-11)
S. Henry Baggett (1971-74, 75-78)	Marion C. Parrish (1985-87)	Rita Mantooth (2000-04)
Guy Misenheimer (1971-72)	Virginia Blease (1986-87)	Keith McAlister (2000-04)
T. M. Swann (1972-76)	Willie E. Boyd (1985-89)	John Kirby (2000-04)

Donnie Woolsey (2000-04)	Teresa Pope (2012-16)
Marion Hope (2000-04)	Darryl Nance (2012-15)
Earl Gilstrap (2001-02)	Jay Ragley (2012-13)
Frances Brewer (2001-03)	Sean Alford (2013-15)
Martie Tiller (2001-04)	Beth Taylor (2013-14)
Henry Adair (2001-05, 06-09)	Judd Starling (2013-16)
Keith Bridges (2001-07)	Jason Valek (2013-15)
Tara Dean (2002-05)	Ozzie Ahl (2014-)
Molly Spearman (2002-05)	Charles Burry (2014-)
Ben Freeman (2002-06)	Bob Hayes (2014-)
Reggie Dean (2002-06, 08-10)	Dee Christopher (2014-)
Jim Berry (2003-06, 07-09)	Kathy Coleman (2015-)
Ted Greene (2003-10)	Shawn Johnson (2015-)
Bennie Bennett (2003-14)	Carroll Hester (2015-16)
Rodney Graves (2004-08)	Joey Haney (2015-16)
Bill Spillane (2004-08)	Ryan Brown (2015-)
Tim Touchberry (2004-06)	Penny Atkinson (2015-)
Rallie Liston (2004-07)	Edmond Burnes (2015-)
Robert Heflin (2004-06)	Patrick Finneran (2015-)
Marvin Byers (2005-06)	Dan Matthews (2016-)
Quincie Moore (2005-07)	Sam Jones (2016-)
Beth Phibbs (2005-07)	Sam Tuten (2016-)
Marion Waters (2006-10, 2012-15)	Steve Wilson (2016-)
Jean Haggard (2006-07)	Maureen Tiller (2016-)
Ray Stackley (2006-10)	Joe Quigley (2016-)
Marisa Vickers (2006-09)	Robby Roach (2016-)
Jackie Hayes (2006-12)	Tiniecia Javis (2016-)
Skip Lax (2007-10)	
Vince Ford (2007-11)	
J. Preston Threatt (2007-12)	
Bruce Moseley (2007-12)	
Keith Brown (2007-08)	
Nancy Turner (2008-12)	
Darryl Johnson (2008-12)	
Marion Lawson (2008-11, 2012-14)	
Mona Lise Dickson (2008-12)	
Ken Hudson (2008-12)	
Lynn Cary (2009-12)	
Joe Keenan (2010-13)	
Sharon Huff (2010-12)	
Steve Boyd (2010-14)	
Devon Smith (2010-15)	
Lou Lavelly (2010-16)	
Stevie Phillips (2011-12)	
Randy Maxwell (2011-12)	
Queenie Boyd (2011-15)	
Rut Dingle (2011-2012)	
Paul Anderson (2012-14)	
Jimmy Huskey (2012-13)	
Mickey Pringle (2012-)	
Billy Strickland (2012-16)	
Lori Marrero (2012-15)	
Joedy Moots (2012-16)	
Akil Ross (2012-)	