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**Sep 08 2020**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Honorable William A. McKinnon, Circuit Court Judge  
Case No.: 2017-CP-32-04435

Appellate Case No.: 2020-000770

Jada Garris.....Respondent,

v.

Lexington County School District One..... Appellant.

**DESIGNATION OF MATTER TO BE  
INCLUDED IN RECORD ON APPEAL**

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

1. Summons and Complaint (w/exhibits), December 6, 2017
2. Acceptance of Service, March 13, 2018
3. Answer and Affirmative Defenses (w/exhibits), May 14, 2018
4. Amended Summons and Complaint, June 13, 2019
5. Defendant’s Amended Answer and Affirmative Defenses, October 24, 2019
6. Trial Transcript Excerpts pp. 1-6, 65-75, 107-112, 128-129, Defendant’s. Trial Ex. 7, October 24, 2019
7. Decision of the Court, November 22, 2019
8. Amended Decision of the Court, January 28, 2020
9. Plaintiff’s Motion for Attorney’s Fees & Costs (w/exhibits), December 2, 2019
10. Defendant's Memorandum in Opposition to Plaintiff's Motion for Attorney’s Fees and Cost (w/exhibits), January 22, 2020
11. Motions Hearing Transcript pp. 40-62, January 27, 2020
12. Amend Decision of Court, January 28, 2020
13. Additional Affidavit (Radeker) (w/exhibits), February 28, 2020

14. Defendant's Supplemental Memorandum of Law in Opposition of Plaintiff's Petition and Motion for Attorney's Fees and Costs (w/exhibits), March 10, 2020
15. Plaintiff's Memorandum of Law in Support of Motion for Attorney's Fees and Costs, March 17, 2020
16. Defendant's Sur-Reply to Plaintiff's Memorandum of Law in Support of Plaintiff's Motion for Attorney's Fees and Costs, March 19, 2020
17. Order Granting Attorney's Fees & Costs, April 6, 2020
18. Defendant's Motion to Alter or Amend A Judgment Pursuant to Rule 59(c) (w/exhibits), April 16, 2020
19. Plaintiff's Motion in Opposition to Defendant's Motion to Amend/Alter Judgment Pursuant to Rule 59(c), April 17, 2020
20. Decision of Court, May 1, 2020
21. Defendant's Notice of Appeal, May 12, 2020

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

Respectfully submitted,

DUFF | FREEMAN | LYON, LLC

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Attorneys for Appellant Lexington School  
District One

September 8, 2020  
Columbia, South Carolina

**CERTIFICATE OF COUNSEL FOR APPELLANT**

The undersigned certifies that the aforesaid Designation of Matter to be Included in Record on Appeal contains no matter which is irrelevant to the appeal and complies with Rule 209, SCACR.

Respectfully submitted,

DUFF | FREEMAN | LYON, LLC

By: *s/David N. Lyon*

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Attorneys for Appellant Lexington School  
District One

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Jada Garris,.....Respondent,

v.

Lexington County School District One, ..... Appellant.

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**PROOF OF SERVICE**

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I certify that on September 8, 2020, I have served the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal on the Respondent, Jada Garris, by e-mailing a copy of the same to her respective counsel of record, addressed as follows:

Taylor M. Smith, IV, Esquire  
Andrew S. Radeker, Esquire  
Harrison & Radeker, P.A.  
[Taylor@Harrisonfirm.com](mailto:Taylor@Harrisonfirm.com)  
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*s/Kim Chatman*  
\_\_\_\_\_  
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ATTORNEYS AND COUNSELORS AT LAW

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September 8, 2020

**VIA ELECTRONIC MAIL ONLY**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate St.  
PO Box 11629 (29211-1629)  
Columbia, SC 29201  
[jkitchings@sccourts.org](mailto:jkitchings@sccourts.org)

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**SC Court of Appeals**

**Re: Jada Garris, Respondent vs. Lexington County School District One, Appellant**  
**Appellate Case No.: 2020-000770**

Dear Ms. Kitchings:

Enclosed herewith for filing are copies of the following documents:

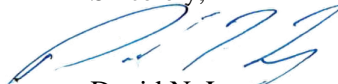
1. Initial Brief of Appellant;
2. Appellant's Designation of Matter to be Included in the Record on Appeal (inclusive of Certificate of Counsel); and
3. Proof of Service.

I would appreciate you date stamping the documents and providing our office with copies of same.

The Respondents' attorneys of records are being served contemporaneously.

Thank you for your time and cooperation.

Sincerely,



David N. Lyon

DNL/kc  
Encls

c: Taylor M. Smith, IV, Esquire (via email only)  
Andrew S. Radeker, Esquire (via email only)  
David T. Duff, Esquire (via email only)