

**RICHLAND COUNTY PUBLIC DEFENDER
YOUTH REENTRY PROGRAM**

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February 1, 2021
Via E-Filing

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Feb 01 2021

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
F: (803) 734-1839
Ctappfilings@sccourts.org

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

Dear Ms. Kitchings:

Counsel for Appellants and Respondents have agreed that the service copies of Defendant's Trial Exhibits 34, 35 and Additional Exhibit 19, which were filed with your office together with Appellants' Amended Motion to Transport Exhibits on October 26, 2020, can serve as the copies of those audio files for the Record on Appeal. (Email Attached.)

I believe this is the only matter outstanding before the briefing and record are complete in this case. Please advise if anything further is needed.

If you have any questions or concerns don't hesitate to contact me.

Sincerely,



D. Michael Mathison
Richland County Public Defender's Office
1420 Henderson St.
Columbia SC, 29201
T: (803) 766-5174
F: (803) 766-5180
Mathison.Michael@richlandcountysc.gov
Attorney for Appellants

Attachment

CC: Jasmine R. Drain, Esq.
Vernie L. Williams, Esq.
Attorneys for the Respondent

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

Jasmine Rogers Drain [jdrain@hmwlegal.com]

Sent: Tuesday, December 15, 2020 12:15 PM**To:** MICHAEL MATHISON**Cc:** Vernie L. Williams [vwilliams@hmwlegal.com]

Mike,

We appreciate the update. We are agreeable to allowing those service copies to serve as the Defendant's/Respondent's Exhibits 19, 34, and 35 for the record.

Thanks,
Jasmine

**HALLIGAN MAHONEY
& WILLIAMS****JASMINE ROGERS DRAIN PARTNER**

THE TOWER AT 1301 GERVAIS STREET, SUITE 1400

PO BOX 11367 | COLUMBIA, SC 29211

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From: MICHAEL MATHISON <MATHISON.MICHAEL@richlandcountysc.gov>**Sent:** Monday, December 14, 2020 2:03 PM**To:** Jasmine Rogers Drain <jdrain@hmwlegal.com>; Vernie L. Williams <vwilliams@hmwlegal.com>**Subject:** RE: T.D. by and through his guardians, A.D. and J.D. v. Richland County School District Two, Appellate Case No. 2019-001603

Jasmine,

Thank you for your letter. I mailed the copies of the audio files that we received from the Richland County Clerk of Court last week. I also received a call from Ms. Kitchings about Judge Manning's letter last week, and I was going to call you today. The Court of Appeals already has copies of Defendant/Respondent's Exhibits 34 and 35 and Additional Exhibit 19, because we filed Richland Two's service copies with the court when we filed our Amended Motion to Transport Exhibits. If

you all are willing to allow those service copies to serve as the Defendants/Respondents exhibits for the record, then Ms. Kitchings will consider the briefing and record complete. If you want to file additional copies of the exhibits, we are amenable to that as well.

Just let us know how you wish to proceed. Ms. Kitchings indicated the Clerk's office will accept the exhibits either way, so long as the parties are on the same page.

Thanks.

D. Michael Mathison
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From: Rhonda D. Foxworth [<mailto:rfoxworth@hmwlegal.com>] **On Behalf Of** Jasmine Rogers Drain
Sent: Monday, December 14, 2020 1:43 PM
To: 'Court Of Appeals Filings'
Cc: MICHAEL MATHISON; Vernie L. Williams; cmanningsc@sccourts.org; 'Manning, L. Casey Law Clerk (Shelby Herbkersman)'
Subject: RE: T.D. by and through his guardians, A.D. and J.D. v. Richland County School District Two, Appellate Case No. 2019-001603

Ms. Kitchings,

Please see the attached.

Thank you,
Jasmine



HALLIGAN MAHONEY & WILLIAMS

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