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Apr 21 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph K. Anderson, III Administrative Law Court Judge

Appellate Case No. 2020-001689

Case No. 2020ALJ300064AP

South Carolina Technical College SystemAppellant,

v.

Carla Jackson and South Carolina Department of Administration,
Of whom, Carla Jackson is theRespondent.

**RESPONDENT’S DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Respondent, in addition to the materials previously designated by the Appellant, proposes that the following be included in the Record on Appeal:

1. Brief of Respondent Carla Jackson, Case Number 18-ALJ-30-0341-AP, dated March 7, 2019
2. Brief of Respondent South Carolina Department of Administration, Case Number 18-ALJ-30-0341-AP, dated April 8, 2019
3. Brief of Respondent Carla Jackson, Case Number 20-ALJ-30-0064-AP, dated August 25, 2020
4. Appellant’s Notice of Motion and Motion for Rehearing/Reconsideration, Case Number 20-ALJ-30-0064-AP, dated October 5, 2020
5. Respondent’s Response in Opposition to Appellant’s Motion for Rehearing/Reconsideration, Case Number 20-ALJ-30-0064-AP, dated October 29, 2020

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

Respectfully Submitted,

CROMER BABB PORTER & HICKS



Shannon Polvi, Esquire (#101837)

1418 Laurel Street

Post Office Box 11675

Columbia, South Carolina 29201

Phone: (803) 799-9530

Fax: (803) 799-9533

Attorney for Respondent Carla Jackson

April 21, 2021

Columbia, South Carolina

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CERTIFICATION OF COUNSEL

I, the undersigned attorney of Cromer Babb Porter & Hicks, LLC, certify that Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal comply with Rule 211(b), SCACR.

CROMER BABB PORTER & HICKS, LLC

BY: 

Shannon M. Polvi (#101837)
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
Facsimile 803-799-9533
Attorney for Respondent Carla Jackson

April 21, 2021
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South Carolina Technical College SystemAppellant,

v.

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Of whom, Carla Jackson is theRespondent.

PROOF OF SERVICE

I do hereby certify that, on April 21, 2021, I served the Respondent’s Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Certification of Counsel by electronic mail to Appellant’s attorneys of record, at the following addresses:

Andrew F. Lindemann, Esquire
Lindemann & Davis, P.A.
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
Andrew@ldlawsc.com

Warren v. Ganjehsani, Esquire
Chief Legal Counsel
South Carolina Technical College System
111 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
ganjehsaniw@sctechsystem.edu

Marcie W. Leaphart
Litigation Paralegal

April 21, 2021
Columbia, South Carolina

C | B | P | H

CROMER BABB PORTER & HICKS, LLC *Attorneys and Counselors at Law*

J. Lewis Cromer * Julius W. Babb, IV * J. Paul Porter * Ryan K. Hicks
Shannon M. Polvi * Samantha E. Albrecht * Elizabeth M. Bowen * Elizabeth S. Millender

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Via Electronic Mail

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org

Re: South Carolina Technical College System v. Carla Jackson
Appellate Case No.: 2020-001689

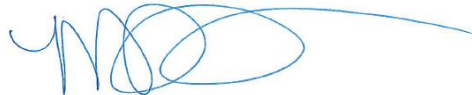
Dear Ms. Kitchings:

Enclosed for filing please find the Respondent's Initial Brief, Respondent's Designation of Matter to be Included in the Record on Appeal, Respondent's Certification of Counsel, and a Proof of Service.

Should you have any questions or concerns, please contact us.

With highest regards, I am

Sincerely,



Marcie W. Leaphart
Litigation Paralegal

/mwl

Enclosures

cc: Andrew F. Lindemann, Esquire
Warren V. Ganjehsani, Esquire
Client