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**Jul 20 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

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Appellate Case No.: 2021-000596  
Case No.: 2021-CP-06-00028

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Ashley Whitehead, individually and as  
Guardian ad Litem for Brantley W.,  
a minor under the age of fourteen (14)  
years and William B. Whitehead,

Appellants,

v.

Barnwell School District 45,

Respondent.

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

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Appellants propose the following to be included in the Record on Appeal:

1. Complaint;
2. Motion to Dismiss;
3. Plaintiff's Memorandum in Opposition to Motion to Dismiss;
4. Defendant's Memorandum in Support of Motion to Dismiss;
5. Plaintiff's Proposed Order;
6. Defendant's Proposed Order;
7. Order of May 10, 2021;
8. Transcript of April 1, 2021.

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

*/Signature page attached*

GOODING AND GOODING, P.A.

BY: s/ Laine B. Gooding  
H. Woodrow Gooding, SC Bar #2180  
Mark B. Tinsley, SC Bar #15597  
Laine B. Gooding, SC Bar #13543  
P.O. Box 1000  
Allendale, SC 29810  
(803) 584-7676  
Attorneys for Plaintiff

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a minor under the age of fourteen (14) years  
and William B. Whitehead,

Appellants,

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Barnwell School District 45,

Respondent.

---

**PROOF OF SERVICE**

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I hereby certify that I have served the Respondent with a copy of the *Initial Brief of Appellant* and *Designation of Matter to be Included in the Record on Appeal* by electronic mail on July 20, 2021, to opposing counsel below:

Allen D. Smith, Esquire (via email [asmith@hmwlegal.com](mailto:asmith@hmwlegal.com))  
Connie P. Jackson, Esquire (via email [cjackson@hmwlegal.com](mailto:cjackson@hmwlegal.com))  
Halligan, Mahoney & Williams  
P.O. Box 11367  
Columbia, S.C. 29211  
(803) 254-4035

s/ Laine B. Gooding

H. Woodrow Gooding, SC Bar #2180

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Allendale, SC 29810

(803) 584-7676

Attorneys for Appellant

July 20, 2021

rlawson@goodingandgooding.com

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**From:** rlawson@goodingandgooding.com  
**Sent:** Tuesday, July 20, 2021 11:58 AM  
**To:** 'cjackson@hmwlegal.com'; 'asmith@hmwlegal.com'  
**Cc:** laine@goodingandgooding.com; 'Crystal Rivers'  
**Subject:** Ashley Whitehead, individually and as Guardian ad Litem for Brantley W., a minor under the age of fourteen (14) years and William B. Whitehead vs. Barnwell School District 45 Civil Action No.: 2021-CP-06-00028  
**Attachments:** 2021.07.20 Ltr to Opposing Counsel.pdf; 2021.07.20 Proof of Service.pdf; Appellants Initial Brief.pdf; Designation of Matter.pdf

Good morning all:

Please find attached correspondence from Laine Gooding, Initial Brief of Appellants, and Designation of Matter to be included in the Record on Appeal. I am also attaching a copy of the Proof of Service to be filed with the Court of Appeals.

Sincerely,

Rhonda

Rhonda F. Lawson, Paralegal  
Gooding and Gooding, PA  
PO Box 1000  
Allendale, SC 29810  
Phone: (803)584-7676  
Fax: (803)584-3614

This message is from the law firm of Gooding and Gooding, P.A. and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

**GOODING AND GOODING, P.A.**

ATTORNEYS AT LAW

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ELIZABETH KEARSE GOODING  
MARK B. TINSLEY  
LAINE BRABHAM GOODING

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**SC Court of Appeals**

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July 20, 2021

**VIA ELECTRONIC MAIL [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny A. Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Ashley Whitehead, individually and as Guardian ad Litem for Brantley W., a minor under the age of fourteen (14) years and William B. Whitehead vs. Barnwell School District 45  
Appellate Case No. 2021-000596

Dear Ms. Kitchings:

Please find attached for filing the Initial Brief of Appellants and Designation of Matter to be included in the Record on Appeal in reference to the above matter. I have also enclosed a Proof of Service upon all counsel for Respondent.

Thank you for your attention to this matter, If you have any questions or need any additional information, please do not hesitate to contact me.

With kind regards, I remain

Sincerely,

s/ Laine B. Gooding  
Laine B. Gooding

LBG/rfl

cc: Allen D. Smith, Esquire (via email [asmith@hmwlegal.com](mailto:asmith@hmwlegal.com))  
Connie P. Jackson, Esquire (via email [cjackson@hmwlegal.com](mailto:cjackson@hmwlegal.com))