

RECEIVED

Aug 18 2021

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM BARNWELL COUNTY
Court of Common Pleas**

Clifton B. Newman, Circuit Court Judge

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

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.

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

Pursuant to Rule 209, SCACR, Respondent, Barnwell School District 45, proposes the following to be included in the Record On Appeal.

1. Summons and Complaint;
2. Defendant’s Motion to Dismiss; and
3. Order of the Honorable Clifton B. Newman dated May 10, 2021

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

Respectfully submitted,

**HALLIGAN MAHONEY WILLIAMS SMITH
FAWLEY & REAGLE, PA**

s/ Allen D. Smith

Allen D. Smith, S.C. Bar No. 15065

asmith@hmwegal.com

Connie P. Jackson, S.C. Bar No. 9488

cjackson@hmwlegal.com

P.O. Box 11367

Columbia, South Carolina 29211

(803) 254-4035

Attorneys for Respondent

August 18, 2021

Columbia, South

RECEIVED

Aug 18 2021

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM BARNWELL COUNTY
Court of Common Pleas**

Clifton B. Newman, Circuit Court Judge

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

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.

PROOF OF SERVICE

I certify that I have served the following documents upon all counsel of record via e-mail and by depositing a copy of same in the United States Mail, postage prepaid, on **August 18, 2021**, and by filing the originals of same with the South Carolina Court of Appeals, 1220 Senate Street, P.O. Box 11629, Columbia, SC 29211.

Documents Served:

- a. Initial Brief of Respondent
- b. Respondent's Designation of Matter to be Included in the Record On Appeal

Counsel Served:

GOODING AND GOODING, P.A.
H. Woodrow Gooding, Esq.
Mark B. Tinsley, Esq.
Laine B. Gooding, Esq.
P.O. Box 1000
Allendale, SC 29810
woody@goodingandgooding.com
mark@goodingandgooding.com
laine@goodingandgooding.com

HALLIGAN MAHONEY WILLIAMS SMITH
FAWLEY & REAGLE, PA

s/ Allen D. Smith

Allen D. Smith, S.C. Bar No. 15065

asmith@hmwegal.com

Connie P. Jackson, S.C. Bar No. 9488

cjackson@hmwlegal.com

P.O. Box 11367

Columbia, South Carolina 29211

(803) 254-4035

Attorneys for Respondent



HALLIGAN MAHONEY & WILLIAMS

HALLIGAN MAHONEY WILLIAMS
SMITH FAWLEY & REAGLE, PA

THE TOWER AT 1301 GERVAIS STREET, SUITE 1400
PO BOX 11367 | COLUMBIA, SC 29211
PH 803.254.4035

HMWLEGAL.COM

WILLIAM F. [BICK] HALLIGAN •
KATHRYN LONG MAHONEY
ALLEN D. SMITH
JOHN M. REAGLE ◊
VERNIE L. WILLIAMS
THOMAS K. BARLOW ◊◊
ALLISON AIKEN HANNA

CONNIE P. JACKSON
KIMBERLY KELLEY BLACKBURN
JASMINE ROGERS DRAIN ◻
DWAYNE T. MAZYCK
SHENEKA S. LODENQUAI ◻
SUSAN M. FITTIPALDI ▷

August 18, 2021

VIA E-MAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

RECEIVED

Aug 18 2021

SC Court of Appeals

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 v. Barnwell School District 45
Appellate Case No. 2021-000596

Dear Ms. Kitchings:

Enclosed are Respondent Barnwell School District 45's Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal, along with a Proof of Service. Thank you for your attention to this matter.

Respectfully,



Allen D. Smith
asmith@hmwlegal.com

/jav
Enclosures

c: H. Woodrow Gooding, Esq.
Mark B. Tinsley, Esq.
Laine B. Gooding, Esq.
Connie P. Jackson, Esq.