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**Mar 16 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Roger M. Young, Sr., Circuit Judge

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Appellate Case No. 2022-000044  
Court of Common Pleas Case No. 2020-CP-10-02726

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OLIVIA M. THOMPSON, PH.D., M.P.H.,

Appellant,

v.

COLLEGE OF CHARLESTON; COLLEGE OF CHARLESTON FOUNDATION, INC.;  
FRANCES C. WELCH, PH.D., M.A.; GODFREY A. GIBBISON, PH.D., M.S.; AND  
CHRISTOPHER R. TOBIN,

Defendants,

v.

Of whom COLLEGE OF CHARLESTON AND FRANCES C. WELCH, PH.D., M.A.  
are Respondents.

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**APPELLANT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL**

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Appellant designates the following to be included in the Record on Appeal:

- (1) Summons and Verified Complaint filed June 24, 2020 with exhibit.
- (2) Plaintiff's Motion for Preliminary Injunction filed June 25, 2020.
- (3) Form 4 Order of The Honorable Daniel D. Hall filed August 13, 2020.
- (4) Answer of College of Charleston, Frances C. Welch, Ph.D., M.A.; and Godfrey A. Gibbison, Ph.D., M.S. to Plaintiff's Complaint filed August 28, 2020.
- (5) Plaintiff's Verified Motion for Temporary Restraining Order and Preliminary Injunction filed April 2, 2021 with exhibits.
- (6) Daniel F. Blanchard, III letter to Randell C. Stoney, Jr. and John Tiller, Esquire filed April 16, 2021 with attachment.
- (7) Randell Stoney email to The Honorable Jennifer B. McCoy April 28, 2021.
- (8) Plaintiff's Motion to Compel Discovery Responses against Defendant College of Charleston filed May 17, 2021 with exhibit.

- (9) Defendant College of Charleston's Responses to Plaintiff's First Supplemental Requests for Production of Documents dated May 20, 2021 and attached department meeting agenda.
- (10) Plaintiff's Motion to Compel Discovery Responses against Defendant College of Charleston filed June 24, 2021 with exhibits.
- (11) Plaintiff's Verified Supplemental Motion for Temporary Restraining Order and Preliminary Injunction filed July 9, 2021 with exhibit.
- (12) Email from The Honorable Diane S. Goodstein September 3, 2021.
- (13) Affidavit of Olivia M. Thompson, Ph.D., M.P.H., filed October 22, 2021 with exhibit.
- (14) Plaintiff's Memorandum in Support of Motions for Temporary Restraining Orders and Preliminary Injunctions filed August 31, 2021 with exhibits.
- (15) Transcript of Hearing before The Honorable Roger Young, Sr. on November 2, 2021, all pages.
- (16) Daniel F. Blanchard, III email to The Honorable Roger M. Young, Sr. dated November 10, 2021 with attached proposed Order.
- (17) Beverly Mitton email to The Honorable Roger M. Young, Sr. dated November 10, 2021 with attached proposed Order.
- (18) Order of The Honorable Roger M. Young, Sr. Denying Plaintiff's Motion for Preliminary Injunction filed November 12, 2021.
- (19) Plaintiff's Motion to Alter or Amend Order Denying Motions for Preliminary Injunction filed November 19, 2021 with exhibits.
- (20) Order of The Honorable Roger M. Young, Sr. Granting Plaintiff's Motions to Compel filed December 16, 2021.
- (21) Order of The Honorable Roger M. Young, Sr. Denying Plaintiff's Motion to Alter or Amend filed December 16, 2021.
- (22) Email from Daniel F. Blanchard, III to The Honorable Roger M. Young, Sr. dated December 7, 2021 and attached copies of Randell Stoney letter to Daniel F. Blanchard, III dated November 24, 2021 and Daniel F. Blanchard, III letter to Randell Stoney dated December 2, 2021.
- (23) Letter from Randell Stoney to Daniel F. Blanchard, III dated December 28, 2021.
- (24) Beverly Mitton email to Daniel F. Blanchard, III dated January 6, 2022 with attached letter from Randell Stoney of same date.

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

Respectfully submitted,

ROSEN HAGOOD, LLC

By: /s/ Daniel F. Blanchard, III

Daniel F. Blanchard, III (SC Bar 65342)

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ATTORNEYS FOR APPELLANT

March 16, 2022.