

**A PROJECT OF THE
SOUTH CAROLINA BAR
LAW RELATED EDUCATION (LRE) COMMITTEE
AND THE MOCK TRIAL SUB-COMMITTEE**

2024-25 SC BAR PRESIDENT

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South Carolina Bar

Law Related Education Division

HIGH SCHOOL MOCK TRIAL PAST STATE CHAMPIONS

Year	Team	Nat'l Finish	Year	Team	Nat'l Finish
1982	Dreher High School		2004	Bob Jones Academy	1 st
1983	Conway High School		2005	Berkeley High School	20 th
1984	Strom Thurmond High School		2006	Berkeley High School	7 th
1985	Strom Thurmond High School		2007	Fort Mill High School	24 th
1986	Myrtle Beach High School		2008	Berkeley High School	32 nd
1987	Strom Thurmond High School		2009	Fort Mill High School	33 rd
1988	Socastee High School	1 st	2010	Bob Jones Academy	33 rd
1989	Berkeley High School		2011	North Myrtle Beach High School	22 nd
1990	Irmo High School		2012	Strom Thurmond High School	34 th
1991	Berkeley High School		2013	North Myrtle Beach High School	13 th
1992	Irmo High School		2014	North Myrtle Beach High School	2 nd
1993	Berkeley High School		2015	Strom Thurmond High School	21 st
1994	Middleton High School		2016	Fort Mill High School	23 rd
1995	Bob Jones Academy		2017	Strom Thurmond High School	26 th
1996	Socastee High School		2018	Heathwood Hall Episcopal	38 th
1997	Socastee High School		2019	Strom Thurmond High School	5 th
1998	Socastee High School		2020	Strom Thurmond High School	Covid
1999	Socastee High School		2021	Bob Jones Academy	5 th
2000	Berkeley High School	10 th	2022	Strom Thurmond High School	26 th
2001	Bob Jones Academy	21 st	2023	Bob Jones Academy	12 th
2002	Berkeley High School	26 th	2024	Strom Thurmond High School	6 th
2003	Bob Jones Academy	9 th			



**2024 State High School Mock Trial Champions
Strom Thurmond High School**

PROFESSIONALISM AND CIVILITY AWARD WINNERS HIGH SCHOOL

The first Professionalism and Civility Awards were presented to one Middle School and High School team at their state competition. The competing teams nominated a team that demonstrated the following qualities inside and outside the courtroom:

- Professional demeanor
- Civility
- Integrity
- Honesty
- Fair play
- Respect for the competition
- Respect for fellow competitors
- Respect for volunteers and all associated with the program inside and outside the courtroom throughout the competition
- Respect for courthouse staff and facilities



HIGH SCHOOL

2017 – Chapin (State)	2021 – W.J. Keenan (Regional)
2018 – Dorman..... (Regional)	2021 – Lexington (Regional)
2018 – Gov. Sch. Science & Math (Regional)	2021 – Ft. Dorchester (Regional)
2018 – Indian Land (Regional)	2021 – Chas. Cty. Sch. of Arts..... (State)
2018 – Kingstree (Regional)	2022 – Chas. Cty. Sch. of Arts..... (Regional)
2018 – Spring Hill (Regional)	2022 – Greenwood (Regional)
2018 – Wilson (State)	2022 – Strom Thurmond (Regional)
2019 – Fort Mill..... (Regional)	2022 – Gov School for Science & Mathematics .. (State)
2019 – Indian Land (Regional)	2023 – Richland Northeast (Regional)
2019 – Kingstree (Regional)	2023 – Strom Thurmond (Regional)
2019 – Socastee (Regional)	2023 – Spring Hill (State)
2019 – Spring Hill (Regional)	2024 – Berkeley (Regional)
2019 – Ft. Dorchester..... (State)	2024 – GREEN Upstate (Regional)
2020 – Dutch Fork..... (Regional)	2024 – Richland Northeast (Regional)
2020 – Heathwood Hall Episcopal.. (Regional)	2024 – Strom Thurmond (Regional)
2020 – Kingstree (Regional)	2024 – Eastside High (State)
2020 – May River (Regional)	
2020 – Wade Hampton (Regional)	
2020 – Carolina Forest..... (State)	

**HIGH SCHOOL MOCK TRIAL
COURTROOM ARTIST AND JOURNALIST STATE WINNERS**

COURTROOM ARTIST

- 2011 – Jane Xu, Dreher High
- 2012 – Megan Greer, Montessori School of Anderson
- 2013 – Elissa Na, Bob Jones Academy
- 2014 – Ezekiel King, Wade Hampton High
- 2015 – Ezekiel King, Wade Hampton High
- 2016 – Natalie Fanello, Montessori School of Anderson
- 2017 – Marina Ataalla, Carolina Forest High
- 2018 – Ruby Dozier, Manning High
- 2019 – Grace Wood, NEXT High
- 2020 – Morela Taffe, Indian Land High
- 2021 – (No competition due to virtual)
- 2022 – (No competition due to virtual)
- 2023 – Mariagustina “Nina” Rodriguez, Indian Land High
- 2011 – Caylyn Bird, Spring Valley High

COURTROOM JOURNALIST

- 2012 – Kayla Fenstermaker, Bob Jones Academy
- 2013 – Ya Fang, Gov School for Science and Mathematics
- 2014 – Ana Kate Barker, Bob Jones Academy
- 2015 – Jacqueline Tobin, Gov School for Science and Mathematics
- 2016 – Kristal L. Herrin, Strom Thurmond High
- 2017 – Rachel Black, York Preparatory Academy
- 2018 – Maggie May, Dorman High
- 2019 – Rachel Black, York Preparatory Academy
- 2020 – Ariel Burrow, Dorman High
- 2021 – (No competition due to virtual)
- 2022 – (No competition due to virtual)
- 2023 – Jacob Mijalli, Scholar’s Academy
- 2024 – No competition

Samples of previous sketch entries can be viewed online. ([click here](#))



Sample Entry by Morela Taffe (Indian Land High School)

INTRODUCTION TO THE MOCK TRIAL COMPETITION

The Mock Trial program is sponsored by the South Carolina Bar Law Related Education (LRE) Division. South Carolina public schools, private schools, and homeschooled students throughout the state are invited to participate in this competitive program in one of two categories: middle school or high school. Each participating school enters a team ideally composed of 16 or more students (and a minimum of 6 students) and requires a teacher coach sponsor. The SC Bar LRE Division assists in locating attorney coaches to help teams prepare for the competition and provides the team with the Case Materials, the Competition Handbook, and other competition materials on the LRE website at www.sctbar.org/lre.

The Mock Trial competitions are divided into regional competitions with a culminating state competition at both the middle and high school levels. A total of twelve teams advance from regional competitions to participate in their respective state competitions using the same case. For high school, the state champion represents South Carolina in the National High School Mock Trial competition using a new national case.

Teams are officially assigned to a region after the drop date assigned for each level. Once a team is assigned to a region, the team cannot switch regions without the approval of the State Mock Trial Coordinator. *(Regions are subject to be split based on courthouse capacity.)*

Competition Schedule for High Schools:

- Regionals Saturday, February 22, 2025
- State..... Friday and Saturday, March 7-8, 2025
- HS Nationals (hosted in Phoenix, Arizona) Thursday – Saturday, May 8-10, 2025

GOALS

The goals of this program are, first and foremost, to educate South Carolina students about the basis of our American judicial system and the mechanics of litigation. The program also serves to build bridges of cooperation, respect, and support between the community and the legal profession. Through participation in the Mock Trial program, students increase important skills such as listening, speaking, writing, reading, and analyzing. All participants are encouraged to keep in mind the goal of the Mock Trial program is not to win for the sake of winning, but to learn and understand the meaning of good citizenship in a democratic republic through participation in our system of law and justice. All who participate in the Mock Trial program are winners in this sense.

Students – Your participation in Mock Trial will allow you to experience what it is like to prepare for and present a case before a presiding judge and scoring judges. Working with your team and coaches in a safe and fun learning environment provided by your school, you will learn to evaluate information and respond quickly to opposing counsel. As you prepare, you will sharpen your public speaking and presentation skills. The greatest benefit is the opportunity to learn how the legal system works. By studying and understanding courtroom procedure, you should become

more comfortable with federal and state laws that are a part of the legal system. Your interaction with some of South Carolina’s finest attorneys and judges in a professional setting will give you a glimpse of the different interpretations of trial procedures and the different litigation styles of individual members in the legal arena.

Teacher Coaches, Attorney Coaches, and/or Judges – We strongly encourage you to focus on the goal of student participation rather than placing an emphasis on winning while preparing for the competition. Your contribution of time and talent make many experiential educational opportunities available annually to South Carolina students. Your participation is a key element to the success of this program. You can be proud of the impact you will make on the lives of these students. All coaches – teachers and attorneys – should obtain and follow the school’s policy on adult/student interaction for in-person and virtual interaction. An attorney is a volunteer for the school and not the SC Bar.

DISCUSSION FORUM

The Mock Trial Discussion Forum is a place to post questions concerning the content of the case materials, the competition rules, and the competition. The discussion forum is located on the LRE website. [Click Here for the Discussion Forum](#)

The link above takes you to a registration page for the discussion forum. It can take up to 48 hours to gain access to the discussion forum once registered. The discussion forum should be checked often for postings. Responses posted to the questions could change competition rules, the case materials, and/or competition specifics on competition day. The discussion forum closes ten business days prior to a competition.

HAVE MOCK TRIAL QUESTIONS?

Attorney Coach Needed.....	Donald N. Lanier
Case	Ask on the Forum Discussion
Competition	Ask on the Forum Discussion or Contact Donald N. Lanier
Concerns	Donald N. Lanier
Credit Card Payment Portal	Online Here
Downloading Materials.....	Donald N. Lanier
Forms	Marian Kirk
Forum Registration.....	Donald N. Lanier
General Questions	Donald N. Lanier
Purchase Orders	Marian Kirk
Registration.....	Marian Kirk
Training.....	Marian Kirk
Webinar Registration	Donald N. Lanier

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2024 - 25

High School Mock Trial Case

2024-25 High School Mock Trial Case:

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INTRODUCTION

Coach Dorian Delaney is a successful and well-known track coach for Southern Carolina High School. Delaney pushes hard, but was it too hard on August 8, 2024, a hot day? On that day, Kylin Abbot, one of the runners on the top relay team, collapsed while running ladders. Kylin did not recover from the collapse and later died at the hospital. The State believes Coach Dorian Delaney is guilty of Involuntary Manslaughter and Unlawful Conduct Toward a Child as a result of the hard practice and allegedly denying the runners fluids during practice. The State and Defense have experts that interpret the cause of Kylin's collapse and death differently.

**The introduction is background material for informational purposes only.
It is not to be considered part of the case materials.**

PLEADINGS

WITNESSES

Bailey Brown

Avery Abbott

ARREST WARRANT NUMBER

DIRECT INDICTMENT

ACTION OF GRAND JURY

TRUE BILL

Brynn Forsyth

Foreperson of Grand Jury

Date: October 1, 2024

VERDICT

DOCKET NO. 2024-GS-46-2695

The State of South Carolina

County of Taylor

COURT OF GENERAL SESSIONS

THE STATE OF SOUTH CAROLINA

vs.

Dorian Delaney

INDICTMENT FOR

S.C. Code Ann. § 16-3-60

INVOLUNTARY MANSLAUGHTER

STATE OF SOUTH CAROLINA)
)
COUNTY OF TAYLOR)

INDICTMENT

At a Court of General Sessions, convened on October 1, 2024, the Grand Jurors of Taylor County present upon their oath:

INVOLUNTARY MANSLAUGHTER S.C. CODE ANN. § 16-3-60

That Dorian Delaney, in Taylor County, on or about August 8, 2024, committed the crime of Involuntary Manslaughter in that the Defendant, Dorian Delaney, did unlawfully, with criminal negligence and reckless disregard for the safety of others, cause the death of Kylin Abbott, to wit: by depriving the victim of fluids and otherwise conducting an unsafe track practice.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.

David W. Miller

DAVID W. MILLER, SOLICITOR

WITNESSES

Bailey Brown

Avery Abbott

ARREST WARRANT NUMBER

DIRECT INDICTMENT

ACTION OF GRAND JURY

TRUE BILL

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THE STATE OF SOUTH CAROLINA

vs.

Dorian Delaney

INDICTMENT FOR

S.C. Code Ann. § 63-5-70

UNLAWFUL CONDUCT TOWARD A CHILD

STATE OF SOUTH CAROLINA)	SEVENTEENTH JUDICIAL CIRCUIT
)	
COUNTY OF TAYLOR)	COURT OF GENERAL SESSIONS
)	
)	
STATE OF SOUTH CAROLINA,)	2024-GS-46-2695
)	
Prosecution,)	
vs.)	
)	
Dorian Delaney,)	
)	
Defendant.)	DEMAND FOR JURY TRIAL
)	

The State of South Carolina filed two indictments against Defendant Dorian Delaney. The indictment was true billed by the Grand Jury on October 1, 2024. Defendant pleads not guilty.

I, the undersigned, do hereby demand a jury trial in the above matter.

Dated: October 1, 2024

Signed: Dorian Delaney
Dorian Delaney, Defendant

STATE OF SOUTH CAROLINA)	SEVENTEENTH JUDICIAL CIRCUIT
COUNTY OF TAYLOR)	COURT OF GENERAL SESSIONS
)	
)	
STATE OF SOUTH CAROLINA,)	2024-GS-46-2695
)	
Prosecution,)	
vs.)	
)	
Dorian Delaney,)	
)	
Defendant.)	
)	

Pre-Trial Order

On this the 1st day of November, 2024, the above-captioned matter came before the undersigned judge for pretrial conference. The parties, appearing through their counsel, indicated their agreement to, and approval of, the terms of this Order, and requested that it be made the Order of this Court. The terms of this order, accordingly, shall not be altered, except upon a showing of good cause.

I. Statement of the Case

The State of South Carolina charged Defendant, Dorian Delaney, with one count of Involuntary Manslaughter in violation section 16-3-60 of South Carolina Code, alleging that on August 8, 2024, Defendant unlawfully caused the death of Kylin Abbott, to-wit: the death occurred when Defendant allegedly deprived the victim of fluids and otherwise conducted an unsafe track practice, contrary to the laws of the State of South Carolina, and the good order, peace and dignity thereof.

The State of South Carolina charged Defendant, Dorian Delaney, with one count of Unlawful Conduct Toward a Child in violation section 63-5-70 of South Carolina Code, alleging that on August 8, 2024, Defendant unlawfully placed a minor, Kylin Abbott, at unreasonable risk of harm affecting the child’s life, physical, and mental health or safety, to-wit: depriving the victim of fluids and otherwise conducting an unsafe track practice, contrary to the laws of the State of South Carolina, and the good order, peace and dignity thereof. Upon arraignment, Defendant pled not guilty to all charges.

II. Stipulations of the Parties

The parties have entered into the following stipulations, which shall not be contradicted or challenged:

1. The death of Kylin Abbott occurred on the evening of August 8, 2024.
2. Kylin Abbott was 17 years old as of August 8, 2024.
3. The gender of Kylin Abbott will match the gender of Frankie Fulton during competition rounds.
4. The family medical history is not in dispute.
5. All exhibits listed are authentic and accurate in all respects.
6. The chain of custody for evidence is not in dispute.
7. The signatures on the witness affidavits and all other documents are authentic.
8. All witnesses who were questioned by law enforcement were properly advised of their Miranda rights.
9. The transcript of the 911 phone call is admissible as a substitute for the actual recording and accurately reflects the contents of the recording. The caller's voice on the recording is identified as Bailey Brown.
10. Exhibit #9 is an aerial photograph of the Southern Carolina High School athletic fields from the public records maintained by the Taylor County School District.
11. Both medical experts are qualified to use and comment on the coroner's findings.
12. Exhibit #4 (the five-day forecast) is admissible as a Record of a Regularly Conducted Activity.
13. Jayden Hamilton and Rory Goodwin are unavailable to testify and their testimony would be duplicative of witnesses called to testify in the case.
14. Sharon Williams and Roger Smith as identified in Exhibit #12 are unavailable to testify, and have nothing pertinent to add.
15. The following words shall be pronounced as indicated below.

Strenaxal..... Stren•ax•al
Hypothalamus Hy•po•thal•a•mus
Hyponatremia Hy•po•na•tre•mia
Amphetamines Am•fet•uh•meens
Svenson Sven•son

**SOUTH CAROLINA
CRIMINAL STATUTES**

S.C. Code Ann. § 16-3-50. Manslaughter

A person convicted of manslaughter, or the unlawful killing of another without malice, express or implied, must be imprisoned not more than thirty years, or less than two years.

S.C. Code Ann. § 16-3-60. Involuntary Manslaughter; “criminal negligence” defined.

With regard to the crime of Involuntary Manslaughter, criminal negligence is defined as the reckless disregard of the safety of others. A person charged with the crime of Involuntary Manslaughter may be convicted only upon a showing of criminal negligence as defined in this section. A person convicted of Involuntary Manslaughter must be imprisoned not more than five years.

S.C. Code Ann. § 63-5-70. Unlawful Conduct toward a child.

(A) It is unlawful for a person who has charge or custody of a child, or who is the parent or guardian of a child, or who is responsible for the welfare of a child as defined in Section 63-7-20 to:

- (1) place the child at unreasonable risk of harm affecting the child's life, physical or mental health, or safety;
- (2) do or cause to be done unlawfully or maliciously any bodily harm to the child so that the life or health of the child is endangered or likely to be endangered; or
- (3) wilfully abandon the child.

(B) A person who violates subsection (A) is guilty of a felony and for each offense, upon conviction, must be fined in the discretion of the court or imprisoned not more than ten years, or both.

S.C. Code Ann. § 63-7-20. Definitions.

When used in this chapter or Chapter 9 or 11 and unless the specific context indicates otherwise:

* * *

- (2) “Affirmative determination” means a finding by a preponderance of evidence that the child was abused or neglected by the person who is alleged or determined to have abused or neglected the child and who is mentioned by name in a report or finding. This finding may be made only by:
 - (a) the court;
 - (b) the Department of Social Services upon a final agency decision in its appeals process; or

(c) waiver by the subject of the report of his right to appeal. If an affirmative determination is made by the court after an affirmative determination is made by the Department of Social Services, the court's finding must be the affirmative determination.

* * *

(5) "Child" means a person under the age of eighteen.

(6) "Child abuse or neglect" or "harm" occurs when:

(a) the parent, guardian, or other person responsible for the child's welfare:

(i) inflicts or allows to be inflicted upon the child physical or mental injury or engages in acts or omissions which present a substantial risk of physical or mental injury to the child, including injuries sustained as a result of excessive corporal punishment, but excluding corporal punishment or physical discipline which:

(A) is administered by a parent or person in loco parentis;

(B) is perpetrated for the sole purpose of restraining or correcting the child;

(C) is reasonable in manner and moderate in degree;

(D) has not brought about permanent or lasting damage to the child; and

(E) is not reckless or grossly negligent behavior by the parents;

* * *

(10) "Court" means the family court.

(11) "Department" means the Department of Social Services.

* * *

(21) "Physical injury" means death or permanent or temporary disfigurement or impairment of any bodily organ or function.

(22) "Preponderance of evidence" means evidence which, when fairly considered, is more convincing as to its truth than the evidence in opposition.

(23) "Probable cause" means facts and circumstances based upon accurate and reliable information, including hearsay, that would justify a reasonable person to believe that a child subject to a report under this chapter is abused or neglected.

* * *

STATE OF SOUTH CAROLINA)	SEVENTEENTH JUDICIAL CIRCUIT
)	
COUNTY OF TAYLOR)	COURT OF GENERAL SESSIONS
)	
)	
STATE OF SOUTH CAROLINA,)	2024-GS-46-2695
)	
Prosecution,)	
vs.)	
)	
Dorian Delaney,)	
)	
Defendant.)	
)	

Jury Instructions

Note: Jury instructions are NOT to be read to the jury on the day of the Mock Trial Competition.

The Court hereby approves the following jury instructions in the above-captioned case.

A. Pre-Trial Instructions:

You have been selected and sworn as the jury to try this case of the State of South Carolina against Dorian Delaney. The defendant is charged with involuntary manslaughter and unlawful conduct toward a child. The indictments in this case are the formal method of accusing the defendant of the crimes. The indictments are not evidence and you should not allow yourselves to be influenced against the defendant by reason of the filing of the indictments. A plea of not guilty puts at issue each element of the crime with which the defendant is charged. A plea of not guilty requires the State to prove each element of the crime beyond a reasonable doubt. The defendant is presumed innocent of the crimes and this presumption continues unless and until, after consideration of all the evidence, you are convinced of the defendant’s guilt beyond a reasonable doubt. The defendant must be found not guilty unless the State produces evidence that convinces you beyond a reasonable doubt of the existence of each element of the crime. It is your responsibility as jurors to determine the facts from the evidence, to follow the law as stated in the instructions from the presiding judge, and to reach a verdict of not guilty or guilty based upon the evidence.

We will now have opening statements of the counsel. Statements and arguments of counsel are not evidence. The purpose of opening statements and closing arguments is to assist you, the jury, in deciding this case; however, that decision must be based upon the evidence in this case, which consists of the testimony delivered under oath in this trial, any documents or other items introduced into evidence during this trial, and the stipulations of the parties.

B. Closing Instructions:

(1) Introduction:

Now that all the evidence has been presented, it is my duty under the law to give you the instructions that apply in this case. The instructions contain all rules of the law that are to be applied by you and all the rules by which you are to weigh the evidence and determine the facts at issue in deciding this case and reaching a verdict. You must consider the instructions as a whole. All the testimony and evidence that is proper for you to consider has been introduced in this case. You should not consider any matter of fact or law except that which has been given to you during the trial of this case.

It is your responsibility as jurors to determine the facts from the evidence, to follow the rules of law as stated in these instructions, and to reach a fair and impartial verdict of guilty or not guilty based upon the evidence, as you have sworn you would do. You must not use any method of chance in arriving at a verdict but must base your verdict on the judgment of each juror.

(2) Elements of the Charge:

In this matter, the defendant has been charged with:

- (a) Involuntary manslaughter, under S.C. Code Ann. § 16-3-60; and
- (b) Unlawful conduct toward a child, under S.C. Code Ann. § 63-5-70.

To these charges, the defendant has entered a plea of not guilty. I will now define the elements of the charges.

Involuntary manslaughter – S.C. Code Ann. § 16-3-60:

The defendant is charged with involuntary manslaughter. To prove involuntary manslaughter, the State must prove beyond a reasonable doubt either that the defendant unintentionally killed the victim without malice, while engaged in a lawful activity with reckless disregard for the safety of others or that the defendant unintentionally killed the victim without malice, while engaged in an unlawful activity not naturally tending to cause death or great bodily harm.

Unintentional means that the defendant did not intend for anyone to be killed or seriously injured.

Unlawful Conduct Toward a Child – S.C. Code Ann. § 63-5-70:

The defendant is charged with unlawful conduct toward a child. To prove unlawful conduct toward a child, the State must prove beyond a reasonable doubt that while in the Defendant's care, the child was placed at unreasonable risk of harm affecting the child's life, physical, and mental health, or safety.

Reckless disregard for the safety of others is more than mere negligence or carelessness. Mere negligence or carelessness is the failure to use the care that a person of ordinary reason would use under the same circumstances. Recklessness is a conscious failure to use ordinary care. Reckless disregard for the safety of others means that you are not interested in the consequences of your acts or the rights and safety of others.

The State must also prove beyond a reasonable doubt that the defendant's act was the proximate cause of death. Proximate cause is the direct cause; it is the immediate cause; it is the efficient cause; it is that cause without which the death of the victim would not have resulted. There must be a chain of causation from the time of the injury inflicted by the defendant until the time of the victim's death. Proximate cause does not necessarily mean that the injury inflicted occurred immediately prior to death.

There may be more than one proximate cause. The acts of two or more persons may combine together to be a proximate cause of the death of a person. The defendant's act may be regarded as the proximate cause if it is a contributing cause of the death of the victim. The fact that other causes also contributed to the death of the victim does not relieve the defendant from responsibility. The defendant's act need not be the sole cause of death but must be a proximate cause contributing to the death of the victim. Negligence on the part of someone else would not relieve the defendant from liability if the injury inflicted by the defendant's act was the proximate cause of the victim's death.

If, after considering all of the evidence, you conclude the State has proven beyond a reasonable doubt that the defendant committed the crime of involuntary manslaughter and unlawful conduct toward a child you must return a verdict of guilty as to these charges on the jury verdict form. If, on the other hand, you conclude that the State has failed to meet its burden of proving beyond a reasonable doubt that the defendant committed the crimes, you must return a verdict of not guilty as to the charges on the jury verdict form.

Presumption of Innocence and Reasonable Doubt:

The defendant is presumed innocent. That presumption continues unless, after consideration of all the evidence, you are convinced of the defendant's guilt beyond a reasonable doubt. The State has the burden of presenting the evidence that establishes the Defendant's guilt beyond a reasonable doubt. The defendant must be found not guilty unless the State produces evidence that convinces you, beyond a reasonable doubt, of each and every element of the crime alleged.

"Beyond a reasonable doubt" is defined as "proof of such a convincing character that you would be willing to rely and act upon it without hesitation in the most important of your own affairs."

Evidence – Definition:

Evidence is the testimony received from the witnesses under oath, stipulations made by the parties, and the exhibits admitted into evidence during the trial.

Evidence – Inferences:

You should consider only the evidence introduced while the court is in session. You are permitted to draw such reasonable inferences from the testimony and exhibits as you feel are justified when considered with the aid of the knowledge that you each possess in common with other persons. You may make deductions and reach conclusions that reason and common sense lead you to draw from the facts that you find to have been established by the evidence in this case.

Indictment Not Evidence:

Again, the indictment in this case is the formal method of accusing the defendant of a crime. The indictment is not evidence of guilt. You should not allow yourselves to be influenced against the defendant by reason of the filing of the indictment.

Judicial Rulings:

The Court has made rulings in the conduct of the trial and the admission of evidence. These rulings should have no bearing on the weight or credit to be given any evidence or testimony admitted during the trial, nor should they be considered by you in any manner to indicate the conclusions to be reached by you in this case.

Objections:

From time to time during this trial, the attorneys have made objections that I have ruled on. You should not speculate upon the reasons why objections were made. If I approved or sustained an objection, you should not speculate on what might have been said or what might have occurred had the objection not been sustained by me.

Credibility of Witnesses:

It is your responsibility to determine the credibility of each witness and the weight to be given to the testimony of each witness. In determining such weight or credibility, you may properly consider: the interest, if any, that the witness may have in the result of the trial; the relation of the witness to the parties; the bias or prejudice of the witness, if any has been apparent; the candor, fairness, intelligence, and demeanor of the witness; the ability of the witness to remember and relate past occurrences; and, the means of observation and the opportunity of knowing the matters about which the witness has testified. From all the facts and circumstances appearing in evidence and coming to your observation during the trial, aided by the knowledge that you each possess in common with other persons, you will reach your conclusions. You should not let sympathy, sentiment, or prejudice enter into your deliberations, but should discharge your duties as jurors impartially, conscientiously, and faithfully under your oaths and return a verdict as the evidence warrants when measured by these instructions.

Punishment:

You are only concerned with the guilt or innocence of the defendant. You are not to concern yourselves with punishment.

C. The Jury: Finders of the Facts

Under our Constitution and Code of Laws, only you—the jury—can make the findings of fact in this case. I am not permitted to tell you how I feel about the evidence which has been presented. Throughout this trial, I have intended to be fair and impartial toward each of the parties involved.

To determine the facts in this case, you will have to evaluate the credibility—or believability of witnesses. You are the sole judges of the credibility of the witnesses. In determining their credibility, you may take into consideration many things, such as:

- (1) How would you describe the appearance and manner of the witness on the stand, sometimes referred to as the demeanor of the witness?
- (2) Was the witness forthright or hesitant?
- (3) Was the witness's testimony consistent or did it contain discrepancies?
- (4) What was the ability of the witness to know the facts about which he or she testified?
- (5) Did the witness have a cause or a reason to be biased and prejudiced in favor of the testimony he or she gave?
- (6) Was the testimony of the witness corroborated or made stronger by other testimony and evidence or was it made weaker or impeached by such other testimony and evidence?

You can believe as much or as little of each witness's testimony as you think proper. You may believe the testimony of a single witness against that of many witnesses—or just the opposite.

Throughout this process you have but one objective—to decide whether the State presented evidence of the defendant's guilt beyond a reasonable doubt

D. Circumstantial Evidence

There are two types of evidence generally presented during a trial: direct evidence and circumstantial evidence. Direct evidence is the testimony of a person who asserts or claims to have actual knowledge of a fact, such as an eyewitness. Circumstantial evidence is proof of a chain of facts and circumstances indicating the existence of a fact in issue. The law makes absolutely no distinction between the weight or value to be given to either direct or circumstantial evidence. Nor is a greater degree of certainty required of circumstantial evidence than of direct evidence.

You should weigh all the evidence in the case in arriving at a verdict.

E. The Judge: Instructor of the Law

The same Constitution and laws that designate and make you the finders of the facts also make me the instructor of the law. You must accept the law as I give it to you. If I am wrong, there is another place and time for that error to be corrected. But for now, you must accept the law as I give it to you—and I caution you that it does not mean what you think the law should be, but what I tell you it is.

E. Verdict Instructions:

After you have retired to consider your verdict, you should select a member of the jury as your foreperson and then begin your deliberations. The foreperson is to maintain orderly deliberations but should have no greater influence on the deliberations than any other member of the jury. Your verdict must be unanimous. When you have agreed on a verdict, your

foreperson will sign the verdict form and you will, as a body, return the verdict form in open court.

F. Verdict Form:

The verdict form approved by the Court is attached hereto.

IT IS SO ORDERED, this day of this round of the Mock Trial competition.

/s/ Presiding Judge

The Honorable Presiding Judge

STATE OF SOUTH CAROLINA)	SEVENTEENTH JUDICIAL CIRCUIT
)	
COUNTY OF TAYLOR)	COURT OF GENERAL SESSIONS
)	
)	
STATE OF SOUTH CAROLINA,)	2024-GS-46-2695
)	
Prosecution,)	
vs.)	
)	
Dorian Delaney,)	
)	
Defendant.)	
)	

JURY VERDICT FORM

We, the jury, empaneled and sworn in the above-entitled cause, do, upon our oaths, find as follows:

Defendant is:

COUNT 1 – Involuntary Manslaughter

_____ Guilty

_____ Not Guilty

COUNT 2 – Unlawful Conduct Toward a Child

_____ Guilty

_____ Not Guilty

Foreperson

**WITNESSES
and
AFFIDAVITS**

WITNESS LISTING

PROSECUTION	
Bailey Brown	Assistant Coach
Avery Abbott	Parent
Cameron Covington	Medical Expert

DEFENSE	
Dorian Delaney	Coach / Defendant
Frankie Fulton	Track Teammate
Shay Erickson	Medical Expert

Affidavit of
Bailey Brown

(Assistant Coach)

1 1. My name is Bailey Brown. I am 26 years old and was born and raised outside of
2 Savannah, Georgia, in a small town called Pembroke. I have been running since I was able to walk as
3 my parents would say. It is not as expensive of a sport to start out with compared to soccer or
4 swimming. Some good shoes, and you are good to go at the younger ages. I remember being a part
5 of organized track and field starting at age 6. I couldn't get enough of running. Distances are my
6 specialty, particularly the 1,500-meter race. I won state for the AAA division in high school and ran
7 track for the University of Florida. You could say I know what it is like to run in hot weather. I finished
8 my undergrad at the University of Florida with a Bachelor's in Physical Education. Next, I moved to
9 Columbia and completed a Master of Education at the University of South Carolina.

10 2. After finishing my master's degree in 2020, I was hired to be the assistant coach to
11 Dorian Delaney at Southern Carolina High School. Who wouldn't want to work under Coach Delaney,
12 given the coach's record both as a runner and a coach? I thought it would be an opportunity to learn
13 more and become a better coach. I also assisted with the summer conditioning program. Since
14 Coach Delaney's suspension in August 2024, I have been the acting head coach at Southern Carolina
15 High School. I had the utmost respect for Coach Delaney, but I think the athletes were pushed too
16 hard. There is a line when pushing becomes counter-productive. Coach Delaney liked to push and,
17 unfortunately, crossed the line this time, causing a tragic and preventable result.

18 3. I remember August 8, 2024, as a hot day. I looked at the weather forecast marked as
19 [Exhibit #4](#). It did not surprise me to see the temps so high. It was probably the hottest day of the
20 summer with the heat index. We were practicing for a regional exhibition meet that Saturday. The
21 two-hour practice started promptly at 5:00 p.m. This was an important meet because it was going to
22 help the coaches determine team assignments for the upcoming season. Things were tense because
23 our times were off and everyone seemed to be sliding backward with their training. As usual, Coach
24 Delaney was focused on the relay teams, always seeming to push the relay teams extra hard. I
25 remember two relay runners, Kylin Abbott and Frankie Fulton, were having problems dropping the
26 baton at practice. They seemed to have had more difficulty than usual for some reason.

27 3. Coach Delaney decided to "sweat the drops out of them." Coach Delaney usually
28 made the team run ladders only to the 30-yard line during warm-ups, but this time Kylin Abbott,
29 Frankie Fulton, Rory Goodwin, and Jayden Hamilton all were made to run ladders as a team between

30 the end zones as punishment. A ladder run is an intense workout involving sprints of different
31 lengths. You go “up the ladder” with intervals of increasing distance. What that meant for the relay
32 runners that day was the coach had them sprint from the closest end zone, touch the ten-yard line,
33 and then sprint back to the starting spot. They touched that line and then sprinted out to the twenty-
34 yard line and so on, until they covered the entire length of the hundred-yard football field.
35 Essentially, it meant they covered 1,100 yards of running, which is not easy. The photo marked as
36 [Exhibit #9](#) is of our track and football field. All the markings on it are correct for where everyone was
37 on August 8th.

38 4. When I asserted that the athletes needed to take more water breaks, Coach Delaney
39 said they had to finish their drills first. I also told Coach Delaney the relay runners looked like they
40 were having problems with the heat, but I got no response. Usually, Coach Delaney had me supervise
41 the individual groups, but I distinctly remember that on that day Coach Delaney was in charge of
42 everything. Yes, I was closer to the relay team than Coach Delaney, but as coach made clear, I was
43 not responsible for anything except the sprints group I was assigned to. I know Coach Delaney saw
44 Kylin stumbling toward the end of the first set of ladders because Coach Delaney told me it looked
45 like Kylin’s heart was not in it that day and expressed concerns about whether Kylin should stay on
46 the relay team. Either way, Coach Delaney did not let the relay team stop running those ladders.
47 About the time the relay team was coming back from the opposite 20-yard line, Frankie and Jayden
48 were helping Kylin run. Coach Delaney told them to let Kylin run without assistance. Frankie yelled
49 they needed a break, but Coach Delaney told them to run a second set of ladders. Coach Delaney
50 told Frankie to quit complaining. I did not see how well they ran the second round of ladders
51 because I was timing other parts of the team. I do know that between the two sets of ladders, the top
52 relay team ran over a mile. This was in addition to the warm-up ladders all the runners did to the 30-
53 yard line. I think it was another ten to fifteen minutes later when I saw Frankie and Jayden
54 supporting Kylin off the field and then dousing Kylin with water. By the time I got there, someone
55 had pulled the hose connected to the sideline water station and started shooting water directly on
56 Kylin. I got Jayden to bring some ice from the concession stand, which we put on Kylin’s neck and
57 under the arms.

58 5. While all this was going on, Coach Delaney was talking to the rest of the team,
59 apparently unaware of what was happening to Kylin. So I ran over to personally tell Coach Delaney

60 about Kylin. Coach Delaney finally came over to check on our fallen runner. After looking at Kylin,
61 Coach Delaney ordered everyone to take water. I think that may have been the first time that day
62 Coach Delaney actually told the team to drink water. Coach Delaney then went back to talk with the
63 rest of the team who were sitting in the home stands, while I stayed with Kylin.

64 6. Kylin started to look worse. I was concerned, so I called 911 on my cell phone. The
65 transcript of my call to 911 is marked as [Exhibit #1](#). I think Rory Goodwin went to get some wet
66 towels. I told the 911 dispatcher Kylin looked pretty bad and was in and out of consciousness. The
67 dispatcher asked what the emergency was, and I said we had a runner down from the heat. We put
68 more water on Kylin, but we got no response and Kylin had a rapid pulse. We were trying to keep
69 Kylin awake. Kylin's eyes were partially open, but they were rolled back in his/her head. We kept
70 talking to Kylin, but there was no real response. Kylin kept making deep moaning noises when
71 exhaling. Soon after, the paramedics showed up. They asked me if Kylin was on any prescription or
72 illegal drugs. I told the EMTs as far as I knew Kylin wasn't on anything. I never saw the Health History
73 Acknowledgement Form for Kylin Abbott. That's not uncommon for assistant coaches not to see
74 medical files unless a student-athlete needs an accommodation. Anyway, they checked Kylin's
75 airway, loaded Kylin on a stretcher, and were quickly gone.

76 7. I think Coach Delaney has done great things for the sport of track. However, the team
77 was pushed too far that day. Although Coach Delaney may deny it, I recall Coach Delaney repeatedly
78 denying players water during the August 8th practice. I knew it was a hot day, but I did not realize just
79 how hot it was. I checked the weather app on my phone later that evening. It showed the same
80 weather report which I mentioned before is marked as [Exhibit #4](#). I learned that Kylin collapsed when
81 it was 90 degrees outside. The heat index made it even hotter. It was the hottest that afternoon, but
82 it was still hot at evening practice, I felt like it was in the 100s. If you factor in what the artificial turf
83 temperature was, we probably should have stuck to only being on the track. Those kinds of fields
84 look great, but they absolutely absorb the heat. We definitely should have had water breaks at least
85 every 30 minutes. I know Coach Delaney received extensive training in the dangers of heat-related
86 illnesses, because we attend a training on this every year, and it is drilled into our heads. The
87 Southern Carolina High School Guidelines on Heat Stress and Athletic Participation marked as
88 [Exhibit #11](#), and Fitness 101: Beat the Heat Before it Beats You marked as [Exhibit #3](#) were both part of
89 the training materials we had to see during the annual teacher coach in-service training.

90 8. Coach Delaney made the relay team run extra ladders as punishment for not
91 practicing hard enough. Coach Delaney threatened to make them keep running until someone quit.
92 To me, dropping a baton does not justify requiring ladders, ultimately causing Kylin Abbott's death.
93 In my opinion, Coach Delaney was aware the relay team was fatigued at the practice, but still
94 ordered them to continue with the ladders as punishment. I hate to say it, but I think Coach Delaney
95 cared more for winning races than for the athletes. I wish I had stepped in sooner, or sometime in the
96 past, but I did not want Coach Delaney to yell at me either. Of course, the team kept on running –
97 they were star-struck by Coach Delaney's resume. They were also frightened by the insults and the
98 challenges Coach Delaney would make to the team insisting they run until someone quit. It was
99 Coach Delaney's practice to set water breaks every forty minutes, but that day I don't recall taking
100 that many water breaks, because Coach Delaney was obviously distracted. The water breaks every
101 forty minutes works during the regular season when it is cooler in the early spring with temperatures
102 hovering around 60 to 70 degrees. During the summer, however, Coach Delaney would yell at the
103 players who tried to take an unscheduled water break, calling them weak, and threatening to drop
104 them from the team.

105 9. I never saw Coach Delaney at the hospital attempting to visit Kylin. I also refused to
106 read about Coach Delaney on social media. It sickens me that some people have so much need for
107 hero worship that they continue to idolize Coach Delaney despite an obvious drive to win at the
108 sacrifice of some great young athletes. There was not much worshiping of Coach Delaney the
109 Saturday after Kylin died-all of us coaches including Coach Delaney, and the school made a joint
110 decision not to compete in the regional exhibition that day. Besides, the team as a whole was too
111 upset to compete with the loss of their teammate. I was glad that following Monday when the school
112 district suspended Coach Delaney for what happened to Kylin. Coach Delaney should be held
113 accountable for such reckless disregard for the safety of our team's athletes.

114

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time. The material facts are true and correct.

Signed,

Bailey Brown

Bailey Brown

SIGNED AND SWORN to me before 8:00 a.m. on the day of this round of the South Carolina Mock Trial Competition.

Anthony Roberts

Anthony Roberts, Notary Public

State of South Carolina

My Commission Expires: 10/24/30

Affidavit of
Avery Abbott

(Parent of Deceased)

1 1. My name is Avery Abbott. I'm 46 years old. I have lived in South Carolina my whole life.
2 I lost my child, Kylin Abbott, to the recklessness of Coach Dorian Delaney. Kylin's death was
3 inexcusable, but it will not be in vain. I do not want this to happen again to anyone else's child. How
4 does a parent describe a loss like this? All I can say is that I am completely crushed every day to wake
5 up without Kylin. Kylin was going to do great things. Track was becoming a large part of Kylin's
6 identity and future plans. I now have this complete void in my life. Everything reminds me of Kylin-
7 songs on the radio, favorite foods, movies we loved to watch together, places we went, and the track
8 field I drive by every day on the way to work. All that is left is Kylin's empty room with a shelf of track
9 trophies and ribbons. Perhaps Kylin's death will serve as a warning for coaches across the nation to
10 be mindful of their responsibility to protect young athletes while they are in their care.

11 2. I do not know who was more excited that Kylin was on the relay team-me or Kylin.
12 Track was my thing and I stuck with it all the way from middle school to college. I was the one in
13 school who had the records everyone wanted to beat. I grew up and ran track and field when there
14 were not so many high school teams as they are today. I ran track at Furman and was part of a relay
15 team that set an NCAA record for our division in the 4 x 200 meters. It only makes sense that Kylin
16 was destined to be good at running.

17 3. Knowing what it takes to be the best athlete possible, I was constantly drilling into
18 Kylin about practicing above and beyond what was required, how to stay conditioned, what to eat
19 and not to eat, getting enough protein, why it was important to stay hydrated without over-
20 hydrating, and getting a good night's rest. Kylin and I did everything we could to prepare for track
21 meets. Kylin was in the best shape possible. I bought all organic foods. We ate lots of fruits and
22 vegetables. I hired a personal trainer to work on conditioning and speed circuit training. While
23 training individually, Kylin always drank enough water to remain hydrated.

24 4. The only drug I knew Kylin took regularly was an over-the-counter pain medication.
25 Kylin occasionally took a prescription medication called Strenaxal for anxiety. I have read the Drug
26 Information sheet on Strenaxal, which has been marked as [Exhibit #6](#). At one point, we thought Kylin
27 would have to take the drug every day. But it turned out it was only needed off-and-on for
28 particularly stressful situations, such as preparing for a meet or academic test. Strenaxal made Kylin
29 very focused, as it took the edge off. Kylin was always responsible with the prescription and never

30 abused it. Kylin only used a little bit of the three-month prescription we filled in February. In the last
31 year or so, Kylin did not appear to need to take the Strenaxal at all. I forgot to list the Strenaxal on
32 the health form because Kylin really wasn't taking it. The Health History Acknowledgement Form I
33 signed for Kylin is marked as [Exhibit #7](#). One of the side effects was nausea. The last thing Kylin
34 wanted to do was to take Strenaxal just before track practice, so I am sure Kylin wasn't taking it
35 before practices.

36 5. I was at practice on Thursday, August 8, 2024. I was going to be out of town for
37 business that coming Saturday, so I thought I would get off work a little early to beat the traffic and
38 sit in on Kylin's practice. I was really excited to learn that Kylin was likely to be picked as the relay
39 team anchor. It was down to Frankie Fulton or Kylin for the anchor position. I was an anchor back in
40 my day. An anchor on the track team is the fastest runner. The fast runners either start the first leg or
41 anchor the fourth leg. The competition for these slots on the Southern Carolina team was usually
42 between Kylin and Frankie. They had been competing for positions like the relay anchor for as long
43 as I have known Frankie. I recall many races where Kylin edged out Frankie by tenths or even
44 hundredths of a second. I was really hoping Kylin would get selected to be an anchor because
45 anchors tend to get the attention of college scouts. I believe there were going to be college scouts at
46 the Saturday meet since it was a regional exhibition and many of the runners were seniors. I don't
47 think you can ever get noticed too early by a college scout.

48 6. When I arrived at the practice and walked over to sit in the visitor stands, the relay
49 runners were not running around the track. Instead, they were running ladders up and down the
50 football field. I asked one of the other parents why they were not practicing relays and was told
51 Coach Delaney was upset with the relay team because they were not hustling, or something like that.
52 I remember running ladders, but we never did them as punishment. You can see where the other
53 parents and I were sitting in the stands by looking at the Aerial view of the Track/Football field and
54 Track Practice Locations on 8/8/2024 as was marked in [Exhibit #9](#).

55 7. I remember that day was especially hot. It turned out it was one of the hottest days of
56 the year with the heat index. I saw the weather report that evening, and a copy of it has been marked
57 as [Exhibit #4](#). People joke that it is not the heat in South Carolina that kills you, but the humidity.
58 That really is no joke! With the humidity so high, it can easily feel like 14 degrees hotter than the
59 actual temperature. I remember it felt like I was swimming through the air that afternoon. All the

60 parents there that day including myself were soaking wet from sweat and all we were doing was just
61 sitting there. It was so hot that the shade seemed to evaporate away. One of the few details still
62 fresh in my memory at the hospital—later that day—was hearing the evening news while I was in the
63 waiting room. The weather forecast reported the heat index on the 8th made it feel like it was 113
64 degrees. I wish I knew why the track team did not practice in the early morning like the football team
65 did. It would have been so much safer for Kylin and everyone else on the team. Yet another place I
66 feel like Coach Delaney failed us all.

67 8. While I was watching the relay team run ladders, it did not look like Kylin felt well.
68 Kylin seemed sluggish, running slower than usual, and stumbling a little. As a former track runner
69 and a parent, I felt for Kylin. But there was nothing I could do. Coach Delaney had very strict rules
70 about parents not being allowed on the field, coaching from the sidelines, or talking to any of the
71 track team members or coaches during practices or meets. My child was not a quitter and if Coach
72 Delaney said to do ladders, I knew Kylin would not have stopped until Coach Delaney said to stop.
73 With some help from the other relay runners, Kylin started to pick it up a bit, so I began talking with
74 some of the other parents to see if they would take pictures and record times at Saturday's
75 exhibition meet. I lost track of Kylin on the field for a little bit with sprints, hurdles, and relays all
76 taking place at once. I do not remember what time it was, but I think it was about fifteen minutes
77 later when I heard some commotion and saw Kylin's relay team rushing off the field. I heard
78 someone shout that a runner collapsed from dehydration. I did not know who it was at the time, but
79 like any parent I was worried. I ran down to the area beside the bleachers where a few of the relay
80 runners who had finished their ladders were gathered near the water station. I was frantically looking
81 for Kylin. As a parent, I feared the worst.

82 9. I pushed my way through the crowd and saw my child on the ground. I could hear
83 Kylin making these loud, wheezing noises when exhaling. When I touched Kylin, Kylin's skin was very
84 clammy and pale, and seemed to be shivering, which seemed strange considering how hot it was. He
85 was breathing heavily. By the time some runners ran and returned to the sidelines with some water,
86 Kylin's coloring changed to a pale blue, Kylin's mouth was gaped open, and moaning.

87 10. It felt like it was at least ten minutes after Kylin collapsed when Coach Delaney finally
88 came over to check on Kylin. I did not even notice Coach Delaney had come over until after someone
89 called for the ambulance. Coach Delaney did not actually come all the way over, but just stood about

90 ten yards away surveying the situation. How could Coach Delaney, who was trained in what to do in
91 these situations, not just stand there and not do anything to help my child? Coach Delaney simply
92 talked with another student and looked at Kylin as if this was entertainment or as if it was an
93 imposition to interrupt the practice. Who knows what Coach Delaney was thinking, but it clearly was
94 not about taking care of Kylin. I did hear Coach Delaney tell everyone else on the team to take a
95 water break after looking at Kylin.

96 11. Honestly, I do not recall much of anything else that day. I know that I rode with Kylin in
97 the ambulance to the hospital and I sat in the waiting room for a really long time before I was
98 allowed into the room. The heat took a terrible toll on Kylin and it was too late to recover from its
99 damages. Kylin never regained consciousness in the hospital. Kylin died later that night, only weeks
100 before turning 18 on August 25th. My child never heard me say goodbye. I met many well-wishers and
101 friends of Kylin at the hospital and the funeral, but I never saw Coach Delaney.

102 12. I really wanted to support Coach Delaney and the other coaches. Some of the assistant
103 coaches were the parents of Kylin's friends. However, in the days and months after Kylin died, I was
104 compelled to learn exactly what happened. I have read the Hospital Report marked as [Exhibit #5](#) and
105 the Autopsy Report marked as [Exhibit #10](#) probably a hundred times since, just trying to make sense
106 of what happened. I even made a Freedom of Information Act (FOIA) request to get and read the 911
107 Transcript, marked as [Exhibit #1](#). Then, the Grand Jury issued an indictment against Coach Delaney. I
108 was not the only one who felt betrayed. Clearly, the State found enough evidence to prosecute
109 Coach Delaney. I want Coach Delaney to be convicted. This has to be a lesson to other coaches.
110 South Carolina summers are not getting any cooler. All coaches need to know the proper strategies
111 to practice during hot days. The coaches need to do a better job enforcing the policies that govern
112 how athletes should be treated on hot and humid days. The prosecution of Coach Delaney
113 demonstrates there are consequences for irresponsible supervision. I am absolutely dumbfounded
114 by the complete lack of urgency Coach Delaney displayed in seeking medical help for my child. Kylin
115 and many other kids looked up to Coach Delaney. We now know that although Coach Delaney can
116 help our youth run faster, it comes at a price. It came at the ultimate price for Kylin. Other parents
117 have been very supportive as my family struggles with Kylin's death. We have to find a new normal
118 because life will never be the same. At least some good might come out of this horrible loss. Coach

119 Delaney should be made an example to all other coaches and assistant coaches in the nation of the
120 consequences of failing to properly care for their athletes.

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time. The material facts are true and correct.

Signed,

Avery Abbott

Avery Abbott

SIGNED AND SWORN to me before 8:00 a.m. on the day of this round of the South Carolina Mock Trial Competition.

William Smith

William Smith, Notary Public

State of South Carolina

My Commission Expires: 12/08/27

Affidavit of
Cameron Covington

(Medical Expert)

1 1. My name is Cameron Covington. I am a board-certified physician and pathologist. I
2 grew up in Cheraw, South Carolina. I graduated from Ball State University. I then started medical
3 school at the University of Arizona's College of Medicine to start somewhere fresh and new. I did
4 some field research in Central America and completed my studies at the Medical University of South
5 Carolina (MUSC). Following my residency, I worked for the Duke University Medical School
6 conducting clinical trials on various new drugs. After that, I felt the desire to return home to South
7 Carolina. Fortunately, there was a vacancy in the Midlands General Hospital in the pathology unit.
8 For the last 13 years, I have been the primary pathologist conducting autopsies for the Taylor County
9 Coroner's Office.

10 2. One day while volunteering at a clinic during medical school, a patient came in with
11 heat stroke. Heat stroke was common with the high temperatures in Arizona, but this case in
12 particular amazed me. I remember the patient was on the brink of death when he came into the
13 hospital, but we were able to save his life. That incident led to my interest in the effects of heat and
14 humidity on the human body. I decided to focus on the effects of excessively high temperatures in
15 tropical climates by working in clinics throughout Central America. I then returned to the United
16 States and finished my training at MUSC.

17 3. I frequently assist the police with their investigations because of the nature of what I
18 do. I have testified in hundreds of cases over the years, usually testifying about toxicology reports in
19 driving under the influence cases, domestic violence cases, and occasionally in homicides. I am
20 proud to say that with my testimony, the solicitor has a ninety percent conviction rate. Since I
21 conducted the autopsy of Kylin Abbott for the coroner's office, I am considered to be employed by
22 the state and not reimbursed for my time working on cases like this one. However, I do get a mileage
23 check, which I think will be around ten dollars. Because I wrote the Autopsy of Kylin Abbott, I am
24 familiar with the contents of [Exhibit #10](#). It is the standard report the Coroner's Office is required to
25 prepare and maintain. In preparation for this trial, I also reviewed the Hospital Report marked as
26 [Exhibit #5](#), the Weather Forecast marked as [Exhibit #4](#), the Drug Information on Strenaxal marked as
27 [Exhibit #6](#), and the education materials the coaches should have known, which were marked as
28 [Exhibit #3](#) and [Exhibit #11](#) respectively. I also sent an email regarding Strenaxal, which along with the
29 response I received has been marked as [Exhibit #2](#).

30 4. In my opinion, to a reasonable degree of medical certainty, the victim, Kylin Abbott,
31 died as a result of dehydration caused by excessive strenuous exercise in hot and humid weather.
32 The cause of death is clear from the medical records—a cause, that could and should have been
33 avoided. I reviewed all the records, including but not limited to, the hospital report when Kylin was
34 admitted to the hospital, medical journal articles on best practices to avoid heat-related illness,
35 weather reports, and other discovery to reach my conclusions.

36 5. The victim was severely dehydrated. Dehydration is generally described as a
37 dangerous loss of fluids. “Dehydration” is a Greek word that is translated as the removal of water
38 from an object. There are three primary types of dehydration: hypotonic, hypertonic, and isotonic. In
39 lay terms, if someone is dehydrated to the point of losing electrolytes, like sodium, that is called
40 hypotonic dehydration. If dehydration is caused by the loss of water, we call that hypertonic. The
41 loss of both electrolytes and water is referred to as isotonic dehydration. In cases of dehydration, the
42 loss of fluids is from all parts of the body. As everyone knows, the body is about sixty percent to
43 seventy percent water. The loss of too many fluids from the body is dangerous. If someone becomes
44 severely dehydrated, there is no longer enough fluid in the body to carry blood to vital organs. As a
45 result, shock can develop quickly.

46 6. Generally, dehydration and damage from the heat leads to a continuum of problems
47 to the human body. Internal changes to the human body are similar to the progressive changes in a
48 boiling egg. At some indefinite point in time, the continuum of heat damage becomes irreversible
49 and past the point nothing can be done medically. Therefore, it is important that dehydration and
50 heat stroke are acted on quickly. Kylin Abbott’s highest body temperature was 106 degrees at the
51 hospital and that was after being removed from the heat. Kylin Abbott’s body temperature never
52 should have gotten that high.

53 7. One of the key factors showing dehydration is confirmed through a urinalysis test. A
54 urine specimen is taken to measure specific gravity. This indicator measures the relative ion
55 concentration of the urine. With dehydration, healthy kidneys can concentrate the urine, which
56 causes a high specific gravity. The specific gravity of pure water is 1.000. The specific gravity in urine
57 is normally in the range of 1.006 and 1.030. The higher the specific gravity number, the more
58 concentrated the specimen is and the more dehydrated a person is. Mild dehydration is considered
59 to be higher than 1.010. Severe dehydration exceeds 1.035. In the morning, after hours without any

60 food or water, the urine will be more concentrated, with a specific gravity greater than 1.025. In this
61 case, the medical records show a specific gravity of Kylin Abbott’s urine at the end of the day of
62 1.024. Again, a reading of 1.000 is equivalent to water, which shows a hydrated person. A dehydrated
63 person would have a higher number because less fluids would be in their system.

64 8. The high humidity and high temperature on August 8, 2024, also played an obvious
65 role in Kylin Abbott’s condition. Although the temperature only reached 90 degrees that day, the
66 heat index topped out at 114 due to the high humidity. The Heat Index reflects what the temperature
67 “feels” like to the body, which in high humidity feels much hotter. The National Weather Service has
68 produced a very helpful Heat Index Chart, which is reflected in [Exhibit #3](#), to reflect what the
69 temperature feels like when air temperature and humidity are considered. This information was
70 included in the materials provided to the Southern Carolina High School coaches during their
71 training. It is important to note that the apparent temperatures are measured in shady locations, not
72 direct sun exposure. It has now been well documented that on an artificial turf field, the temperature
73 can be 40-70 degrees hotter than the ambient air. In my opinion, had the defendant been paying
74 even slight attention to the heat conditions and/or the victim’s condition during practice,
75 appropriate hydration and reasonable breaks could have been administered, which would have
76 avoided this tragic death.

77 9. I was asked about the defendant’s theory in the case. The link to Strenaxal is weak.
78 There is no support for the theory. While there have been reports of heat stroke deaths caused by
79 amphetamines, these occurred in people taking excessive amounts of the drug, for example, for
80 weight control or other reasons. I was a contributing consultant—although not named in the
81 article—on a news piece from 2020 where we explained the fears of Strenaxal appeared to be
82 unfounded. A copy of that article has been marked as [Exhibit #8](#). Simply concluding the victim was
83 not dehydrated is inaccurate. The records take into account the fact that the victim was provided
84 additional fluids en route to the hospital and more upon arrival in the emergency room.

85 10. The dosage for Strenaxal for the victim was 20 mg. This is not enough to cause an
86 adverse reaction. The autopsy results do not cite Strenaxal as a cause or contributing factor in the
87 death. The cause of death is listed as “total organ failure as a result of severe dehydration.” The
88 victim was a track athlete—five feet eight inches tall and 145 pounds.

89 11. I have done some research on the drug Strenaxal. The literature from the drug
90 company says it is safe. I sent an email to the makers of Strenaxal and received a response from
91 Svenson Barker, a spokesperson for the drug company that manufactures Strenaxal, which states
92 there is no data to support Strenaxal, when used according to approved labeling, causes or
93 contributes to heat stroke. I have seen no studies calling Strenaxal's safety into question. In my
94 experience, the drug companies produce information in their product literature and advertising that
95 is at least more accurate than not. Besides, the U.S. Food and Drug Administration has taken no
96 action against the Strenaxal drug manufacturer, noting that 30 million prescriptions for the drug
97 were issued over the past ten years, and the number of sudden deaths among users was no greater
98 than would be expected among a similar number of adults and children not taking the drug. We can
99 assume Strenaxal is widely used by the student population. I do not believe the school district has
100 required students using Strenaxal to stay off the field in hot weather for any sport.

101 12. Moreover, the defendant was properly indicted by the grand jury for causing the death
102 of Kylin Abbott. The only cause of death was the defendant's lack of appropriate care and
103 supervision of the student athletes, including failure to ensure they were consuming sufficient
104 amounts of water to avoid dehydration, especially given the weather conditions.

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time. The material facts are true and correct.

Signed,

Cameron Covington

Cameron Covington

SIGNED AND SWORN to me before 8:00 a.m. on the day of this round of the South Carolina Mock Trial Competition.

C.H. Graves

C.H. Graves, Notary Public

State of South Carolina

My Commission Expires: 12/10/29

Affidavit of
Dorian Delaney

(Coach and Defendant)

1 1. My name is Dorian Delaney. I am 42 years old and originally from Raleigh,
2 North Carolina. I was part of the relay teams holding the state record in high school and NCAA
3 records in college. I ran track for NC State University. I am the head track coach for Southern Carolina
4 High School. My specialty is the relay, which consists of the 4x100 meter, 4x200 meter, and the 4x400
5 meter. The relay is where the individual sprinters act as a team. Four individuals each run their
6 sprint and pass a baton in a relay format. All three are very elegant races in their own right. I should
7 know. My greatest personal achievement came during my senior year of college when I made the
8 Olympic track team. I was the first alternate for the gold-winning 4x400 meter relay team in the 2004
9 Olympics in Greece. I have been back to the Olympics again in Beijing in 2008.

10 2. I believe I am a very good track coach. My record speaks for itself. Like any good
11 athlete, much of what I have become and much of my success comes from my own past coaches. I
12 ran track most of my life. I started running when I was in middle school when I joined a summer track
13 team through the local YMCA. I was almost ready to quit after the first season, but I did not because
14 my coach kept pushing and pushing me to work harder and harder. Coach Thorpe was a retired
15 Marine drill sergeant and the part-time track coach for the local high school where I graduated.
16 Coach Thorpe did not cut me any slack. I still recall him barking the four D's of track: Discipline,
17 Dedication, Direction, and endurance. He used to run me until I would collapse and then run me
18 some more. In my second summer of track, I was winning nearly every race. When I got to high
19 school, I lettered in track all four years and I won first place in the 4x100 meter and 4x400 meter as
20 well as the 100-meter and 400-meter individual races at the state track meet in both my junior and
21 senior years.

22 3. After the Olympics in Greece, I was invited to coach the track team at Southern
23 Carolina High School (SCHS) in the fall of 2005. The SCHS track team has been a great success under
24 my coaching for nearly two decades. My relay teams have finished in the top three of every track
25 meet they have competed in since August of 2008. I always expect nothing less from year to year. I
26 was also hired by the U.S. Olympic Team to coach the 4x400 meter relay team for the 2012 London
27 Olympics.

28 4. I remember Thursday, August 8th was a busy practice because the team was training
29 for a regional exhibition meet that coming Saturday. Most of the team was putting in 100% necessary
30 to get ready for the meet. However, my top relay team was not trying hard enough. They kept
31 dropping the baton and stepping out of their lanes. They were being lazy. Those types of mistakes
32 can be devastating! The relay team, consisting of Frankie Fulton, Kylin Abbott, Rory Goodwin, and
33 Jayden Hamilton, was complaining of being tired. I could tell from my years of experience that they
34 were simply not trying hard enough. My coach at the Olympics used to tell us that he would “sweat-
35 out our lollygagging” and then he’d make us run laps. That is what I thought Frankie, Kylin, Rory, and
36 Jayden needed. I know now I might have pushed a little hard wanting the relay team to do better,
37 but that is what coaches do—MOTIVATE.

38 5. I told the top relay team to start running “ladders.” Ladders are a series of sprints
39 running between certain marks in the field touching each mark before running to the next mark up
40 the ladder, back and forth until every mark on the field is tagged. Since we were practicing on a track
41 around the football field, the relay team was running between the end zones and touching every ten-
42 yard line. The total distance is a little more than a half a mile. Since the relay team was otherwise a
43 good bunch of runners, I knew if I told them to run ladders, they would run them, so I directed my
44 attention to my other runners. As usual, my assistant coach, Bailey Brown, was in charge of making
45 sure the relay team completed their ladders. Bailey was responsible for directly supervising their
46 activities and, as such, should have seen if they were cramping up, stumbling, etc.

47 6. Coach Brown came to me and said Kylin Abbott was complaining. I saw Kylin running
48 slowly when they were almost finished with the first set of ladders—when they were returning from
49 the opposite 20-yard line. Kylin was not trying, which I had seen all too often in runners before. As
50 usual, Frankie being the fastest runner, was in front of the rest of them. So, I told the relay team to
51 start another set of ladders. To push them, since they needed it, I might have told the relay team they
52 would continue running until one of them quit the team. I do not remember anyone asking for water.
53 I had regularly scheduled water breaks every forty minutes. Consumption of water more frequently
54 than that causes cramps. Although the athletes were informed of this water break schedule from this
55 first day of practice, they were always encouraged to get water whenever they needed it. Sometimes
56 lazy athletes use “I’m thirsty” as an excuse to slack off. Part of my job as a coach is to distinguish
57 between an actual need for hydration and wimping out.

58 7. When I last observed the relay team, Kylin was walking upright, without assistance,
59 breathing normally, and looking like a track runner that had been conditioned. After starting the top
60 relay team on their second round of ladders, I left Coach Brown in charge of them and went back to
61 working with the other two relay teams. I was coaching the other runners at the northwest corner of
62 the track. You can see clearly where everyone was during practice if you look at the Aerial View of
63 Track/Football Field and Track Practice Locations on 8/8/24, as was marked as [Exhibit #9](#). I was
64 timing runners out of their starting blocks-you know those yellow wedges the runners use to start
65 from. I was very busy with timing, keeping them organized, and motivating them. We had our hands
66 full that day.

67 8. Before practice was to end at 7:00 p.m., I called the team to come together and join
68 me for an “inspirational” meeting as they finished their drills. I motioned for the meeting to take
69 place over at the home stands, since those stands were already in the shade by 6:00 p.m. After Kylin’s
70 relay team finished their ladders, they were supposed to join the rest of the team in the home stands.
71 Nobody said, “Hey Coach, something is going on.” I conducted the team meeting on the west side of
72 the field with my back to the field. I did not see that Kylin was helped off the field.

73 9. Coach Brown notified me Kylin stumbled when finishing the second round of ladders.
74 I went over to see how Kylin was doing. As soon as I realized how serious the situation was, I
75 instructed Coach Brown to call 911. I do not know why 911 had not been called sooner. This is all part
76 of our school district general emergency plan that we train on every year. [Exhibit #3](#) and [Exhibit #11](#)
77 are both parts of the training materials we go through from the district level every year. Coach Brown
78 clearly had the authority and the brains to take initiative and call 911 immediately upon seeing
79 something like that. Someone had gotten some wet towels and ice for Kylin. Avery Abbot was with
80 Kylin, so I ordered the rest of the team to go get something to drink and go back over to the home
81 stands to cool down. This also prevented the rest of the team from gawking at Kylin and getting in
82 the way of the emergency services personnel.

83 10. Kylin was taken to the hospital by ambulance. I went to visit Kylin in the hospital, but
84 the hospital staff would only allow family members in, so I left. I’m told Kylin never regained
85 consciousness. I learned of Kylin’s death the following morning. I was devastated, as we all were. I
86 discussed with the school and our coaching staff the circumstances and we mutually agreed the
87 students were not to compete in the regional exhibition planned for Saturday. On Monday, August

88 12, 2024, the school district “encouraged” me to take a leave of absence from teaching and coaching,
89 pending the investigation into the death of Kylin Abbott. The school district has not made a final
90 decision on my return until all of the facts, and the present litigation are resolved. All of this hit me
91 really hard. You know, to lose one of my star runners. To lose my team and all the runners I care so
92 much about.

93 11. I asked Coach Brown sometime over that weekend about the scheduled water breaks
94 for the team. Coach Brown confirmed the team was given at least two scheduled water breaks-every
95 40 minutes-at the August 8th practice. Coach Brown also told me, later, that during practice the
96 temperature reached 90 degrees, but over 100 with the heat index. I still do not see how that is
97 accurate. It certainly did not feel that hot to me. I have heard others criticize me for holding
98 practices late in the day. Unfortunately there isn’t anything else I could do about it. The football
99 team has the priority on the fields in the early morning time. The only option it would leave me
100 would be to have the entire team practice in the gym, or up and down the hallways of the school
101 building. That would be an absolutely unrealistic way to practice, and on surfaces which do not
102 match the actual environment they compete in. I am fully aware of the Southern Carolina High
103 School Guidelines on Heat Stress and Athletic Participation; however, those are guidelines only.
104 Every sport is different. Every athlete is different. If I allowed my sprinters to drink water every 20
105 minutes, they would not be able to run. In any event, the team was split up into two groups so each
106 group was running only about 35 minutes consecutively in time and the other half of the team was
107 resting. All of the team ran some ladders to the 30-yard line that day for a warmup.

108 12. I apologized to Kylin’s family even though I do not think I did anything wrong. I will
109 strive in the future to make sure something like this does not happen again. I do remember reading
110 the Health History Acknowledgement Form for Kylin, which was marked as [Exhibit #7](#). It did not list
111 Kylin as being on any medication that could have affected how I would handle my student-athletes.
112 If there was something indicated on the form, I would have made special accommodations for Kylin.
113 I’m a firm coach, but I’m not a monster who would risk someone’s life. I am sympathetic to Kylin’s
114 parents, but I also would like to reiterate I lost one of my top runners on the field that day. These
115 runners are like my children. I lost a child that day too! I kept driving Kylin as any coach would have
116 pushed a student who had star athlete potential. The bottom line is that I delegated responsibility
117 for the relay team to Coach Brown. Coach Brown should have reported a problem with any of my

118 runners to me immediately! If Coach Brown had been following the guidelines and using common
119 sense, Kylin would be here today and would be breaking high school records left and right as we
120 speak.

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time. The material facts are true and correct.

Signed,

Dorian Delaney

Dorian Delaney

SIGNED AND SWORN to me before 8:00 a.m. on the day of this round of the South Carolina Mock Trial Competition.

Michala Watson

Michala Watson, Notary Public
State of South Carolina
My Commission Expires: 4/3/29

Affidavit of
Frankie Fulton

(Track Teammate)

1 1. My name is Frankie Fulton. I am a junior at Southern Carolina High School. I have been
2 running track since fifth grade. I hope to go to college at the University of Oregon so I can one day
3 run in the Olympics. I would love the opportunity to work with Coach Dorian Delaney, you know,
4 Coach “D” on the Olympic team. I have been following Coach D’s career, it seems, all my life. That is
5 why I was so excited to join the team at Southern Carolina High School where Coach D was coaching.

6 2. I am pretty fast. Just from working with Coach D, I shaved more than a second off my
7 100-meter time. That is quite an accomplishment if I do say so myself! Since I was getting faster,
8 Coach D had me try out for one of the relay teams. The relay teams are where Coach D finds track
9 stars! You know, Coach D has coached most of the Olympic relay runners in the last ten years. Just
10 imagine—that could be me.

11 3. Coach D usually had me running first or last on the top relay team. This means that I
12 was one of the fastest runners on the team. My favorite position was the anchor so that I could be the
13 one who crosses the line and wins it for the team. If another runner had a better time than me at the
14 practices, I would lose my anchor position from one meet to the next. It seems like Kylin Abbott’s
15 time and my time were always really close, which added a whole extra layer of competition for us.
16 The friendly competition we had was just that, “friendly.” I used to joke Ky only beat me because
17 his/her nose was five-hundredths of an inch longer than mine. It did bother me some that Ky beat me
18 55% of the time. Ky’s parent, Avery Abbott, was real big in college track back in the day and set quite
19 a few amazing school records—one or two still have not been broken to this day. Ky expressed
20 concerns to me on several occasions about not being able to live up to Avery’s expectations. The
21 pressure would have rattled the best of us. Ky was really stressed and was constantly taking some
22 medicine to calm down. Ky seemed to be more nervous when Avery was going to be at a practice or
23 meet. Ky commented before practice on August 8th that Avery was going to be at practice that day
24 since s/he was going to be out of town over the weekend. I really felt bad for all that extra pressure
25 on Ky, but that didn’t stop me from wanting to anchor the top relay team in the next meet.

26 4. Ky and I are both natural runners. I cannot help but wonder if Ky really liked being on
27 the team. I really had to work hard at being the best with Ky around. I especially had to work on my
28 baton passing. Baton passing is much harder than it looks. You have to run as fast as you can while
29 trying to pass a small 30-centimeter aluminum tube by reaching forward and placing the baton in the

30 hand of the next runner who is receiving the baton blindly. Most importantly, you must not drop the
31 baton. No matter how much I practice, I still have trouble with getting the pass right. Believe it or
32 not, I am better at the down-sweep handoff than the up-sweep handoff. This is where, as the runner,
33 you place the baton in a downward motion into the waiting runner's upturned hand. The upsweep
34 handoff is especially tricky with speed, balance, and timing.

35 5. Coach D saw me drop the baton too many times in practice and started calling me
36 "butterfingers." Coach D gave everyone on the top relay team a nickname, but mostly called us
37 "babies" if we complained we were running too hard or if we said our hands were too sweaty to hold
38 the baton. We were called other names as well, but it was only to motivate us to run faster. We knew
39 Coach D's intentions and it worked for us!

40 6. I remember August 8th was a very hot day. It seemed like the sun was two feet away
41 from the track. Looking at the Weather Report marked as [Exhibit #4](#) later in the evening, it would
42 seem I was right. Coach D always insisted we wear light-colored clothing because the dark colors
43 would absorb heat more. I do not think it would have mattered what color we wore that day. It was
44 hot. On that particular day, Kylin Abbott, Rory Goodwin, Jayden Hamilton, and I were having
45 problems with the baton again. I recall Ky made a joke that we only dropped the baton because it
46 was the blue one and we never dropped the lucky red baton. We were having a good laugh about it
47 and that is when Coach D told us to start running ladders. I do not like running ladders on the
48 football field because there are too many lines on the field. You know, the ten, the twenty, the thirty,
49 all the way to the other end of the field. At least Coach D did not make us run to every 5-yard line,
50 which would have meant running back and forth between every five yards instead of every ten yards.
51 You can clearly see the field and the stations where everyone was running, and parents sitting if you
52 look at the Aerial View of the Track/Football Field and Track Practice Locations on 8/8/24, marked as
53 [Exhibit #9](#).

54 7. While Ky, Rory, Jayden, and I ran the ladders, Coach D was working with the other
55 relay teams on their starting blocks. Coach Brown was working with the sprinters on dashes near the
56 visitors' side of the track. Dashes are just a bunch of short sprints—only 40 meters and 100 meters —
57 to work on speed. I am pretty sure they were warming up to mark their times in preparation for our
58 meet that Saturday. We only break when the coaches say we can take a break. When we asked for a
59 water break, Coach Brown said Coach D wanted us to finish our set of ladders first.

60 8. As usual, I was running next to Ky, who seemed to be running slower than normal. We
61 were almost finished with the first round of ladders when Coach D yelled at us, saying we were not
62 trying hard enough. We were ordered to run another full set of ladders. Coach D said if we kept
63 complaining, we would have to run all of the lines, meaning every 5-yard mark instead of 10 yards.
64 Doing that would more than double the distance we had to run. Coach D said we were to run until
65 one of us quit the team.

66 9. Just as we were almost done with the second round of ladders, Ky collapsed at the 30-
67 yard line at the south end of the field. I know Ky collapsed around 6:45 p.m. because I remember
68 glancing at my watch just before it happened. It was really hot and I remember thinking we only had
69 fifteen minutes left of running in the heat. I printed out the social media exchange with a couple of
70 friends last year marked as [Exhibit #12](#). We were complaining back and forth last year when Coach D
71 ran us so hard that I got sick.

72 10. I did not know what happened to Ky. Ky was really cold, clammy to the touch, and did
73 not look right. Ky was mumbling and did not make sense, so we took Ky to the side of the track. One
74 of the first adults I remember seeing was Avery Abbott, who stayed with Ky while I ran and got some
75 water. I stayed with Ky waiting for the ambulance to come. I remember Coach D came over and
76 found out Ky wasn't feeling well and that is when Coach D told everyone to take a break and get
77 water. I saw Coach Brown call 911 at some point.

78 11. The ambulance quickly loaded Ky and went to the hospital. Several of us went up to
79 the hospital that night, but they only let family in. I was in the waiting room when I learned that Ky
80 died. The next day, Jayden said s/he was quitting the team. I am not sure if Jayden quit as a result of
81 Ky's death because, a week later, Jayden's family moved to Wyoming. I have not heard or seen
82 Jayden since.

83 12. Anyway, I do not think Coach D did anything wrong. In fact, I helped to organize a
84 GoFundMe for Coach D's legal costs and a social media campaign with #saveCoachD. Approximately
85 150 current and former runners who were trained by Coach D posted pictures and comments. We
86 raised several hundred dollars for the legal costs too. The point of this was to help Coach D, not to
87 point any fingers or pass the blame. Several of the track players posted pictures of their team jerseys
88 from over the years to let Coach D know they still wanted to be a part of Coach D's team.

89 13. I didn't get to talk to Coach D about everything after Ky died. I'm sure Coach D was
90 broken up and I know Coach D is sorry about Ky. I know I miss Ky too. However, persecuting a coach
91 who only wanted to drive the team to be the best is not the solution. It is not fair to anyone.

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time. The material facts are true and correct.

Signed,

Frankie Fulton

Frankie Fulton

SIGNED AND SWORN to me before 8:00 a.m. on the day of this round of the South Carolina Mock Trial Competition.

Miriam Wrenn

Miriam Wrenn, Notary Public

State of South Carolina

My Commission Expires: 12/08/26

Affidavit of
Shay Erickson

(Medical Expert)

1 1. My name is Dr. Shay Erickson. I am a former pathologist with the Savannah Regional
2 Hospital in Savannah, Georgia. I started working at the hospital in 2017, which is right after I
3 graduated second in my class from the Medical University of South Carolina (MUSC). I have always
4 wanted to work in medicine. When I was attending college at the College of Charleston, I worked
5 part-time as a drug sales representative. My job was to discuss my drug company's products with
6 doctors, provide samples, and answer any questions. The best-received product was a pain killer
7 that was usually prescribed to patients recovering from surgery. For full disclosure, I never sold any
8 drugs manufactured by Big Drug Company. In any event, my prior experience with drug sales gives
9 me an important perspective on the present proceedings.

10 2. Savannah Regional is a city hospital, so the majority of crime victims are treated there.
11 Since the hospital had a high volume of deaths merely due to our location, I performed hundreds of
12 autopsies during my tenure. After five years of working at Savannah Regional, I decided to start my
13 own consulting business. I started Shay Erickson Consulting Services in 2022. My typical clients are
14 defendants in criminal cases. My fee is \$750.00 per hour plus travel expenses. I have worked 20 hours
15 in preparation for testimony in this case on behalf of the defendant, Dorian Delaney. When I am
16 involved in a case, my client is found guilty only ten percent of the time.

17 3. I was contacted by the legal team for Coach Dorian Delaney to review the medical
18 records and autopsy of the deceased, Kylin Abbott. To do this, I was provided copies of the pertinent
19 documents. As part of that, I reviewed the 911 Transcript marked as [Exhibit #1](#), the Weather Forecast
20 for the area marked as [Exhibit #4](#), the Hospital Report marked as [Exhibit #5](#), the Drug Information on
21 Strenaxal marked as [Exhibit #6](#), the Health History Acknowledgement Form for Kylin marked as
22 [Exhibit #7](#), the Aerial View of Track/Football Field and Track Practice Locations on 8/8/24 marked as
23 [Exhibit #9](#), and the Autopsy Report marked as [Exhibit #10](#). It is clear the prosecution's expert, Dr.
24 Cameron Covington, is wrong. The prosecution stopped its investigation at merely declaring the
25 deceased suffered from dehydration. To me, the prosecution's expert stopped at an overly simple
26 explanation because discovering the truth was too difficult. Dr. Covington ignores the clear evidence
27 of the actual and tragic cause of death.

28 4. In my opinion, to a reasonable degree of medical certainty, the cause of death was
29 heat stroke brought about by exposure to heat while taking Strenaxal. Although Strenaxal is a

30 commonly prescribed medication, it has significant side effects that can be exacerbated in certain
31 circumstances. One of the triggers causing the severe side effects is extreme exertion. I believe
32 patients like student-athletes are at a higher risk of developing adverse side effects. We know in this
33 case, the deceased clearly suffered from one or more of the published side effects for Strenaxal.
34 Therefore, we know the deceased should not have been allowed to play sports in the first place, and
35 certainly not a sport as demanding as track.

36 5. The deceased was taking the prescribed amphetamine, Strenaxal, a drug used to treat
37 anxiety. Strenaxal is taken by millions of people to help them with anxiety and for Attention Deficit
38 Hyperactivity Disorder (ADHD). It has proven to be extremely helpful only when appropriately
39 administered for short attention spans, anxiety, including panic attacks, chest pains, sweating,
40 choking, nausea, etc. Anxiety affects the mouth, stomach, skin, sleep, sight, and even touch. The
41 manufacturer has spent millions of dollars trying to convince everyone—including the FDA—that
42 Strenaxal is a safe drug. Despite this, I was able to find one article describing the dangers of
43 Strenaxal, which is marked as [Exhibit #8](#). Unfortunately, in this case, the prescribed anxiety drug the
44 deceased was taking most likely triggered the heat stroke that resulted in death. Strenaxal contains
45 an amphetamine that can cause the body to overheat. It is a stimulant that, just like diet pills and
46 caffeine, can itself make someone much more susceptible to heat stroke. We have learned in the
47 course of discovery that although the deceased was prescribed the drug by a physician, was self-
48 medicating with Strenaxal or at least choosing when and how much of the drug to take. Dosage
49 recommendations should always be followed for any medication.

50 6. I believe there is no indication the deceased was dehydrated. Generally, dehydration
51 is a condition where one loses excessive water from their system. The records show the deceased
52 was hydrated when brought to the local emergency room. This is demonstrated by the results of the
53 urinalysis test combined with other examinations showing there was sufficient water—i.e., normal—in
54 the body upon arrival at the hospital. The records show urine output with the assistance of a
55 catheter in the hospital. A urine specimen is taken to measure specific gravity. This indicator
56 measures the relative ion concentration of the urine. With dehydration, healthy kidneys can
57 concentrate the urine. This causes a high specific gravity. The specific gravity of pure water is 1.000.
58 The specific gravity is normally in the range of 1.006 and 1.030. The higher the number the more
59 concentrated the specimen. But a high specific gravity reading does not necessarily translate into a

60 fatal dehydration state. For example, in the morning, after hours without any food or water, urine is
61 naturally more concentrated, with a specific gravity greater than 1.025. In this case, the medical
62 records show a specific gravity of the urine of 1.024. This is in the tolerable, normal range of
63 hydration, which means the deceased was not dehydrated.

64 7. It is significant that the deceased was the only athlete who collapsed on August 8,
65 2024. All of the other athletes were under the same conditions for heat, exertion, and fluid intake.
66 The deceased was the only person noted in the emergency room records to have suffered a heat
67 related injury that day. I am aware that Dr. Cunningham bases the opinion that dehydration caused
68 Abbott's death on the temperature and heat index on the day of practice. However, that opinion is
69 flawed because it is based on the weather *forecast*, not an actual record of the conditions that day.
70 Even if the forecast was completely accurate, the purported heat index of 113 degrees was predicted
71 for 4:00 p.m. After that time, the temperature and humidity—followed by the heat index—would have
72 been lower.

73 8. I have read the drug information on Strenaxal, as shown in [Exhibit #6](#). Heat stroke is
74 not a listed side effect for the drug. However, since the drug contains amphetamines, it can interfere
75 with the operation of the hypothalamus, causing core body temperatures to rise. The drug warnings
76 do state that the drug is known to cause sudden death in patients. I do not know how many deaths
77 have been reported, but the tragic death of Kylin Abbott is enough. This just goes to show how our
78 society wants a quick fix to everything and to blame others for their own problems. It is amazing how
79 many people have either over-medicated themselves or their children all for the purposes of
80 defeating anxiety at the extreme cost of potential death. To me, that is not an even trade off. The
81 drug companies should be more responsible.

82 9. This is an unfortunate circumstance that could have been avoided. The deceased
83 should have known not to play sports while taking Strenaxal. Coach Dorian Delaney obviously did
84 not know about the deceased taking Strenaxal. It would be unreasonable to believe Coach Delaney
85 would have failed to intervene knowing the deceased was self-medicating with Strenaxal. I do not
86 see how Coach Delaney could have any criminal liability in this case.

WITNESS ADDENDUM

I have reviewed this statement, and I have nothing of significance to add at this time. The material facts are true and correct.

Signed,

Shay Erickson

Shay Erickson

SIGNED AND SWORN to me before 8:00 a.m. on the day of this round of the South Carolina Mock Trial Competition.

A.G. Molli

A.G. Molli, Notary Public

State of South Carolina

My Commission Expires: 12/15/29

EXHIBITS

EXHIBITS AVAILABLE TO BOTH PARTIES

The parties have stipulated to the authenticity of the trial exhibits listed below. The Court will, therefore, not entertain objections to the authenticity of these trial exhibits. The parties have reserved any objections to the admissibility of any of these exhibits until the trial of the case. The trial exhibits may be introduced by either party, subject to the Rules of Evidence and the stipulations of the parties contained in the materials.

EXHIBIT #	EXHIBIT DESCRIPTION
1	911 Transcript – August 8, 2024
2	E-Mail Regarding Use of Strenaxal
3	Best Practices to avoid Exertional Heat illness in Athletics.
4	Five-Day Forecast (August 3 – 7, 2024)
5	Hospital Report on Kylin Abbott
6	Drug Information on Strenaxal
7	Health History Acknowledgement Form for Kylin Abbott
8	Medication Suspected of Causing Fatal Heart Problems Article
9	Aerial View of Track / Football Field and Track Practice Locations on 8/8/2024
10	Autopsy Report on Kylin Abbott
11	Southern Carolina High School Guidelines on Heat Stress and Athletic Participation
12	Social media thread

The parties reserve the right to dispute any other legal or factual conclusions based on these items and to make objections to these items based on other evidentiary issues.

Exhibit #1: 911 Transcript – August 8, 2024

August 8, 2024

6:57 pm Call received

Dispatch: 911. What is your emergency?

Caller: We have a student collapsed from the heat.

Dispatch: Please state your location.

Caller: We're at the Southern Carolina High School track on Palmer Road.

Dispatch: Are you in need of EMS?

Caller: Yes. Kylin collapsed from being overheated. We've got water and ice on Kylin right now. Kylin seems to be responding, but the pulse is real fast.

Dispatch: (Dispatch to EMS Unit #24. Heat stroke. 9000 Palmer Road – Southern Carolina High School track. Over.)

Dispatch: Is there anyone else that needs assistance from EMS when they arrive?

EMS: Unit 24 responding. En route to 9000 Palmer Road – Southern Carolina High School track.

Caller: I don't think so. Kylin's not making any sense. We're trying to get Kylin to keep his/her eyes open. (Yelling) Jayden, go get some more ice.

From Caller: Come on get those eyes open...keep your eyes open...there you go...get those eyes all the way up...get those eyes open...there you go.

Dispatch: The ambulance is en route and is approximately two minutes away.

Caller: Good. Please tell them to hurry. Kylin seems to be in and out.

Dispatch: Don't worry. I will stay on the line with you until EMS arrives.

Background

Noise: Muffled, undeterminable speaking

EMS: Unit 24 arriving on scene at 9000 Palmer Road. Designate this as Palmer Command.

Caller: I see the ambulance. They're here.

Dispatch: Good. They will take over.

Caller: Thanks! (Phone cuts off.)

7:00 pm Call ended.

Exhibit #2: E-Mail Regarding Use of Strenaxal

Cameron Covington

From: Svenson Barker [sbarker@bigdrugcompany.org]
Sent: Wednesday, November 20, 2024 2:48 PM
To: Cameron Covington
Subject: RE: Strenaxal Side Effects

Doctor Covington:

I received your inquiry about one of our popular drugs, Strenaxal. We at Big Drug Company are happy to assist the medical community. Strenaxal has proven to be a very safe and effective drug for all types of patients to whom it is prescribed. We believe the drug is safer than aspirin. Please note there is no credible data to support that Strenaxal, when used according to approved labeling, causes or contributes to heat stroke. This has been shown in clinical trials as well as by product surveys.

Thank you again for your inquiry. Please send me your complete address and I will forward you some samples of Strenaxal you may find useful.

- S.B.

From: Cameron Covington <CameronCovington@abc123.com>
Date: Fri., 19 Nov 2024 10:08:33 AM
To: <bigdrugcompany.org>
Subject: Strenaxal Side Effects

I have a question about Strenaxal. I had a patient who suffered from heat stroke at a track practice. Patient presented at the track fine, but an hour and a half later was suffering from heat stroke. Lost consciousness. Never regained consciousness. Was taking Strenaxal. I have read your literature and wanted to know the health risks.

Dr. Cameron Covington
Doctor of Pathology
Midlands General Hospital
South Carolina

Exhibit #3: Haley, Pat MD. Best Practices to Avoid Exertional Heat Illness in Athletics. *National Sports Medicine Journal of Sport Injury Prevention*. 2019; 24(2): 46 – 48. (Page 1 of 4)

Exertional heat illness includes exercise-associated muscle cramps, heat syncope, heat exhaustion, and exertional heat stroke (EHS). Current best practice guidelines suggest that the risk of exertional heat injuries can be minimized with heat acclimatization and diligent attention to monitoring individuals participating in activities that place them at a higher risk for these types of injuries. In the event an athlete sustains a heat illness, immediate and proper treatment is needed.

I. Prevention

A thorough medical history should be gathered. Individuals with risk factors should be identified and counseled. The person responsible for the student should be notified of individuals with pre-existing conditions that place the individuals at risk of exertional heat illness. See the table below.

Risk Factors of Heat Illness	
Intrinsic	Strategies to Minimize Risk
High-intensity exercise	Gradually phase in exercise and conditioning.
Fever or illness	Monitor and remove at-risk athletes as necessary.
Dehydration	Educate coaches/athletes on proper hydration. Provide adequate access to water.
Lack of heat acclimatization	Follow heat acclimatization program.
Medications (antihistamines, diuretics, ADHD drug, etc.)	Monitor and remove at-risk athletes as necessary.
Skin disorder (sunburn or malaria rubra)	Monitor athletes closely.
Predisposing medication condition	Monitor and remove at risk athletes as necessary.
Extrinsic	Strategies to Minimize Risk
High ambient temperature, solar radiation or humidity	Avoid exercise in hotter parts of the day.
Heavy gear or equipment	Gradually introduce equipment.
Poor practice design	Educate coaches regarding strategies to minimize risk.

II. Monitor Environment

Environmental monitoring should occur anytime the outside temperature exceeds 70 degrees Fahrenheit (°F). A Wet Bulb Globe Temperature (WBGT), a comprehensive measurement tool that measures ambient temperature, relative humidity, wind and solar radiation from the sun, is used to

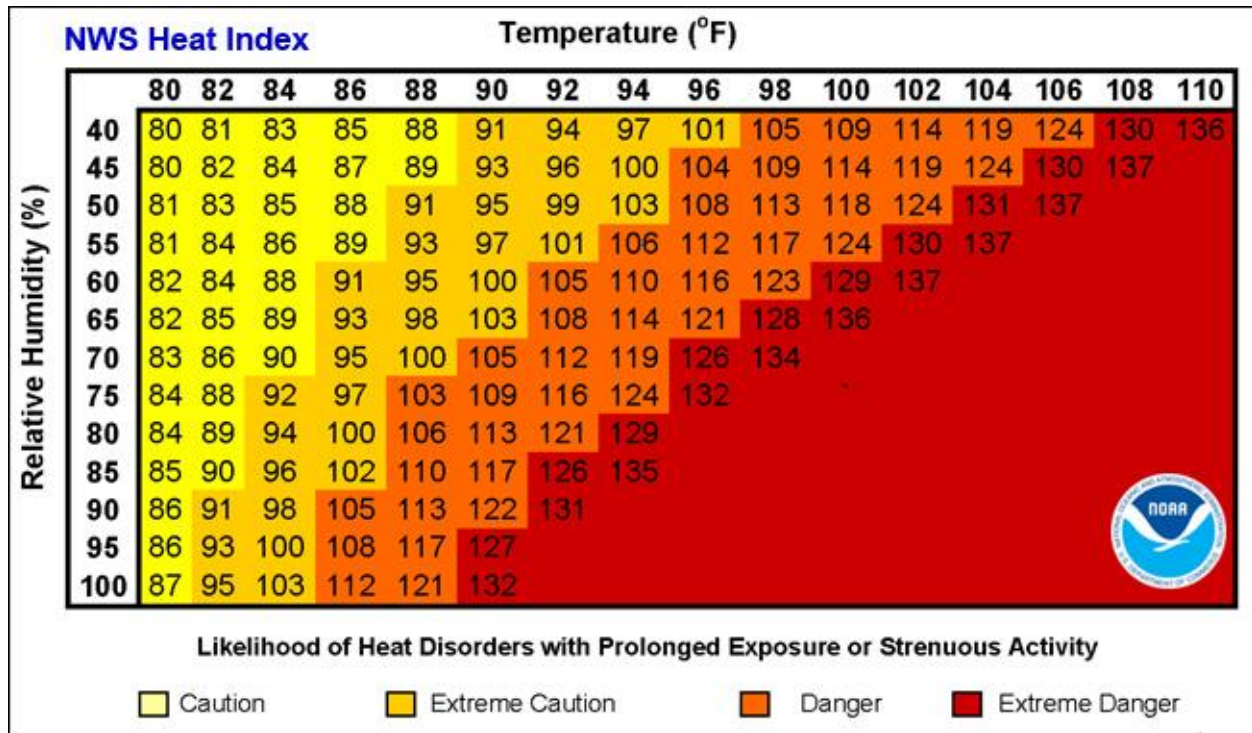
Exhibit #3 Continued (Page 2 of 4)

indicate the heat-related stress on the human body during exercise. It differs from the heat index, as it is a more comprehensive measurement of environmental heat stress on the body.

WBGT (°F)	Activity Guidelines
< 82.0	Normal Activities Provide at least three (3) separate rest breaks each hour with a minimum duration of 3 minutes each during the workout.
82.2 - 86.9	MINIMUM three (3) separate rest breaks each hour with a minimum duration of 4 minutes each. Cold water immersion tub or other rapid cooling method should be prepared and ready.
87.1 - 90.0	TWO (2) HOUR MAXIMUM length of practice (not including rest breaks). MINIMUM four (4) separate rest breaks each hour with a minimum duration of 4 minutes each. Cold water immersion tub or other rapid cooling method prepared and ready
90.1 - 91.9	ONE (1) HOUR MAXIMUM length of practice (not including rest breaks). MINIMUM twenty (20) minutes of rest breaks distributed throughout the 1-hour practice. Cold water immersion tub or other rapid cooling method prepared and ready Consider delaying practice/competition until a cooler WBGT is reached.
≥ 92.1	NO OUTDOOR WORKOUTS. Delay practice/competition until cooler WBGT is reached

When WBGT is not available, monitor environmental temperature using the National Weather Service Heat Index Chart to determine the “feels like” temperature using the temperature at the outdoor practice facility and relative humidity. Keep in mind the Heat Index measures the temperature in the shade. In direct sun exposure the “feels like” heat index value may be up to 15°F higher. Research from Penn State University’s Center for Sports Surface Research and Brigham Young University has indicated that surface temperatures of synthetic turf fields regularly rise well above 100 °F, in some cases synthetic turf fields average 30 plus degrees higher than asphalt and 80 plus degrees hotter than natural turf. See Attachment A for complete chart.

Exhibit #3 Continued (Page 3 of 4)



The above chart provided by the National Weather Service outlines the effects on the body based on heat index temperatures.

Classification	Heat Index	Effect on the body
Caution	80°F - 90°F	Fatigue possible with prolonged exposure and/or physical activity
Extreme Caution	90°F - 103°F	Heat stroke, heat cramps, or heat exhaustion possible with prolonged exposure and/or physical activity
Danger	103°F - 124°F	Heat cramps or heat exhaustion likely, and heat stroke possible with prolonged exposure and/or physical activity
Extreme Danger	125°F or higher	Heat stroke highly likely

III. Hydration

Athletes should drink water and other palatable hydrating fluids before, during, and after exercising. (Drink six to eight ounces of fluid every 15 to 20 minutes during exercise). Coaches or other persons in charge must ensure athletes receive adequate opportunities for rehydration during exercise and competition.

Exhibit #3 Continued (Page 4 of 4)

IV. Signs, Symptoms, Treatment

Coaches and other athletic personnel should be educated on the signs and symptoms of exertional heat illness. Student-athletes' safety should be monitored continuously during any physical activities. Signs and symptoms of exertional heat illness include, but are not limited to:

- Rectal temperature greater than 104 (40°C) at time of incident.
- Headache
- Confusion or appearing “out of it”
- Disorientation or dizziness
- Altered consciousness, coma
- Nausea, vomiting or diarrhea
- Rapid pulse, low blood pressure, quick breathing
- Dehydration, dry mouth, thirst
- Decreasing performance or weakness
- Profuse sweating
- Collapsing, staggering or sluggish feeling
- Muscle cramps, loss of muscle function/balance, inability to walk
- Irrational behavior, irritability, emotional instability

Any athlete with signs of central nervous system dysfunction during exercise in the heat should be suspected to be suffering from Exertional Heat Stroke (EHS) until rectal temperature confirms or refutes this diagnosis. If the rectal temperature is at or above 104°F, EHS is highly likely. EMS (911) should be called immediately. EHS is a medical emergency and immediate steps must be taken to cool the athlete in distress—cold water immersion tub or cold wet towels to the neck, underarms, and groin area can be used. Any patient with EHS must be cooled FIRST and then transported via EMS.

V. Return to Activity

Patients who have suffered an exertional heat illness must complete a rest period and obtain clearance from a physician before beginning a progression of physical activity under the supervision of a qualified medical professional.

Exhibit #4: Five Day Forecast (August 6 - 10, 2024)






<h2 style="text-align: center;">August 6 – 10, 2024</h2> <h3 style="text-align: center;">Taylor County, SC</h3>					
	Tuesday August 6	Wednesday August 7	Thursday August 8	Friday August 9	Saturday August 10
	 High: 90° Low: 68° Mostly Sunny	 High: 88° Low: 76° Morning T-Storms	 High: 90° Low: 78° Sunny	 High: 90° Low: 79° Sunny	 High: 90° Low: 80° Partly Cloudy
Chance of Rain	0%	40%	0%	10%	10%
Relative Humidity	50	45	80	50	45
Heat Index / Feels Like	95° at 4 pm	89° at 4 pm	113° at 4 pm	95° at 4 pm	93° at 4 pm

Exhibit #5: Hospital Report on Kylin Abbott



Midlands General Hospital

PATIENT NAME: Kylin Abbott

DATE: August 8, 2024

TIME OF ARRIVAL: 7:16 p.m.

TIME OF TREATMENT: 7:16 p.m.

INSURANCE COMPANY and Policy Number: To Be Provided by Parent

IF UNDER AGE OF 18, GUARDIAN NAME: Avery Abbott

History:

17 yo patient with no known past medical history presents via EMS after collapsing at track practice. Patient was outside running laps, drills, etc. and became progressively sluggish, weak, and altered consciousness. 911 was called and it was reported that the patient was clammy, pale and had a rapid heart rate. When EMS arrived blood pressure was 78/48, heart rate 136, and telemetry strip revealed a narrow complex supraventricular tachycardia (heart rhythm disorder) which appears to be sinus tachycardia (heart rhythm with elevated rate). IV access was obtained and 1 liter of normal saline was infused on transport.

On arrival, patient was unable to give additional review of symptoms.

Past Medical History:

Anxiety

Social History:

High school student, family denies significant alcohol nor tobacco use

Family History:

No history of arrhythmias nor sudden cardiac death

Drug Allergies:

No known drug allergies

MEDICATION(S):

Strenaxal 20mg per day

Physical Exam:

General depressed level of consciousness, Temp 106°, Heart Rate: 139, Blood Pressure: 80/50
Head, Ears, Eyes, Nose, Throat ... inside of mouth dry, pupils equally round and reactive to light
Lungs clear in both lungs
Cardiovascular excessively rapid heartbeat, no significant murmurs heard
Abdominal soft, insensitive to pressure, normally active bowel sounds
Extremities warm and clammy to touch
Neurological not following commands but withdraws to pain, reflexes intact

Electrocardiogram (EKG):

Sinus tachycardia (heart rate elevated)

Foley Catheter:

10 cc urine

Significant Labs:

Urinalysis: specific gravity 1.024, ketones positive
 Urine Drug Screen: positive for amphetamines
 Sodium: 119
 Glucose: 42
 Creatinine Kinase: 449 (enzyme found in heart)

Impression:

Heat stroke with acute intravascular volume depletion (dehydration) with severe hyponatremia (low concentration of sodium in the blood)

Plan:

Aggressive volume resuscitation with Normal Saline administered en route to hospital and more upon arrival in the emergency room. Catheter placed in patient. Admitted to Medical ICU. Patient died 8/8/2024 at 10:23pm. Body will undergo an autopsy.

Exhibit #6: Drug Information on Strenaxal

STRENAXAL

Strenaxal (Stren·ax·al)

Highlights of Prescribing Information:

These highlights do not include all the information needed to use Strenaxal safely and effectively. (See full prescribing information for Strenaxal.)

WARNING -- POTENTIAL FOR ABUSE:

- Amphetamines have a high potential for abuse; prolonged administration may lead to dependencies.
- Misuse of amphetamines may cause sudden death and serious cardiovascular adverse reactions.
- Benzodiazepines may cause severe reactions with alcohol consumption
- Stopping Benzodiazepines suddenly or reducing the dose quickly may cause seizures.

INDICATIONS AND USAGE:

Strenaxal, a stimulant with benzodiazepine, is indicated for the treatment of anxiety and Attention Deficit Hypertension Disorder (ADHD).

DOSAGE AND ADMINISTRATION:

Pediatric patients (ages 6-17): 20mg once daily in the morning. Maximum dose for children 6-12 is 15 mg once daily.

Adult patients: 30mg once daily in the morning (maximum dosage)

DOSAGE FORMS AND STRENGTHS:

Capsules: 5mg, 10mg, 15mg, 20mg, 25mg, 30mg

REASONS NOT TO USE THIS DRUG:

- Symptomatic cardiovascular disease
- Moderate to severe hypertension
- Hyperthyroidism
- Glaucoma
- Agitated Status
- History of drug abuse
- During or within 14 days following the administration of monoamine oxidase inhibitor or MAOI antidepressant drugs.

WARNINGS AND PRECAUTIONS:

- **Serious Cardiovascular Events:** Sudden death has been reported with usual doses of amphetamines in children and adolescents with structural cardiac abnormalities or other serious heart problems; sudden death, stroke, and myocardial infarction have been reported.
- **Avoid Extreme Exertion:** To avoid extreme exertion, consult your physician first.
- **Increase in Blood Pressure:** Monitor blood pressure and pulse at appropriate intervals.
- **Psychiatric Adverse Events:** Medication may cause increased psychiatric symptoms in patients with no prior history. Monitor for aggressive behavior.
- **Long-Term Suppression of Growth:** Monitor height and weight at appropriate intervals.

- **Strenaxal contains an amphetamine that can cause the body to overheat.** It is a stimulant that makes patients much more susceptible to heat stroke. (Amphetamines have a high potential for abuse; prolonged administration may lead to dependencies. In addition, misuse of amphetamines may cause sudden death and serious cardiovascular adverse reactions.)

ADVERSE REACTIONS

- **Children (ages 6 to 12):** Most common adverse reactions (with a higher incidence than a placebo): loss of appetite, insomnia, abdominal pain, weight loss, nervousness, nausea, and fever.
- **Adolescents (ages 13 to 17):** Most common adverse reactions (with a higher than a placebo): loss of appetite, insomnia, abdominal pain, weight loss, nausea, and nervousness.
- **Adults:** Most common adverse reactions (with a higher than a placebo): loss of appetite, insomnia, headache, dizziness, weight loss, nausea, abdominal pain, weight loss, anxiety, agitation, and urinary tract infection.

MEDICATION GUIDE:

Read the Medication Guide that comes with Strenaxal before taking the medication or getting a refill as there may be new information. This Medication Guide does not take the place of talking to your doctor about you or your child's treatment with this medication.

Strenaxal is taken once daily. It is used for the treatment of anxiety. Strenaxal may help with creating calmness and a better ability to cope with situations around them.

Most Important Information to know about Strenaxal:

- 1) **Heart-Related Problems:** Can cause heart-related problems, sudden death in patients who have heart problems or heart defects, cause stroke and heart attacks in adults, and may increase blood pressure.
- 2) **Mental Problems:** Can cause new or worse behavior and thought problems, new or worse aggressive behavior or hostility, hearing voices, believing things that are not true, and/or becoming suspicious.
- 3) Don't take Strenaxal if you are taking MAOIs medications.
- 4) Prolonged administration may lead to dependencies.

DO NOT START TAKING STRENAXAL WITHOUT TALKING TO YOUR DOCTOR FIRST.

How to Take Strenaxal:

- Take Strenaxal exactly as prescribed. Your doctor may adjust the dose until it is right for you or your child.
- Take once daily with or without food.
- If you or your child takes too much Strenaxal or overdoses, call your doctor or poison control center right away, or get emergency treatment.

Common Side Effects Include:

- Loss of Appetite
- Insomnia
- Abdominal Pain
- Weight Loss
- Nervousness
- Nausea
- Fever
- Headache
- Agitation
- Dizziness

Exhibit #7: School Medical Release for Kylin Abbott



**SOUTHERN CAROLINA HIGH SCHOOL
HEALTH HISTORY ACKNOWLEDGEMENT FORM
FOR PARTICIPATION IN EXTRACURRICULAR SPORTS/ACTIVITIES**

Student participation in track (extracurricular sport/activity) for the 2024-2025 season (time period) is voluntary and not required as a student at Southern Carolina High School (SCHS). By signing this document below, student, Kylin Abbott, and parent (if the student is under age 18), Avery Abbott, acknowledge that the Student’s participation in the above-referenced extracurricular sport or activity is voluntary and that the information included below is correct and complete. Specifically,

1. Parent hereby gives consent for the above-named Student to participate and complete in SCHS’s above-referenced program, including travel with the school representative(s) on authorized school trips.
2. Student and Parent acknowledge that participation in the above-referenced program includes risk of injury that may range in severity.
3. Student and Parent acknowledge that they should keep SCHS informed of any accommodations that they deem appropriate that may affect Student’s ability to fully participate in the above-referenced program.
4. Student is currently taking the following medications: none

5. Student has the following allergies (i.e., to foods, medications, etc.): none

6. Student lists the following additional accommodations: none

The undersigned have read, voluntarily signed this form, and further agree that no oral representations, statements, or inducements, apart from this agreement, have been made.

Parent’s Signature: Avery Abbott

Date: July 15, 2024

Student’s Signature: Kylin Abbott

Date: 7-15-24

Exhibit #8: Medication Suspected of Causing Fatal Heart Problems Article

Midlands Newspaper.com

Medication Suspected of Causing Fatal Heart Problems

Patients want to know if medication for anxiety causes heart attacks.

By MG Harper, Midlands Newspaper.com staff writer

October 15, 2022: 3:23 PM EST

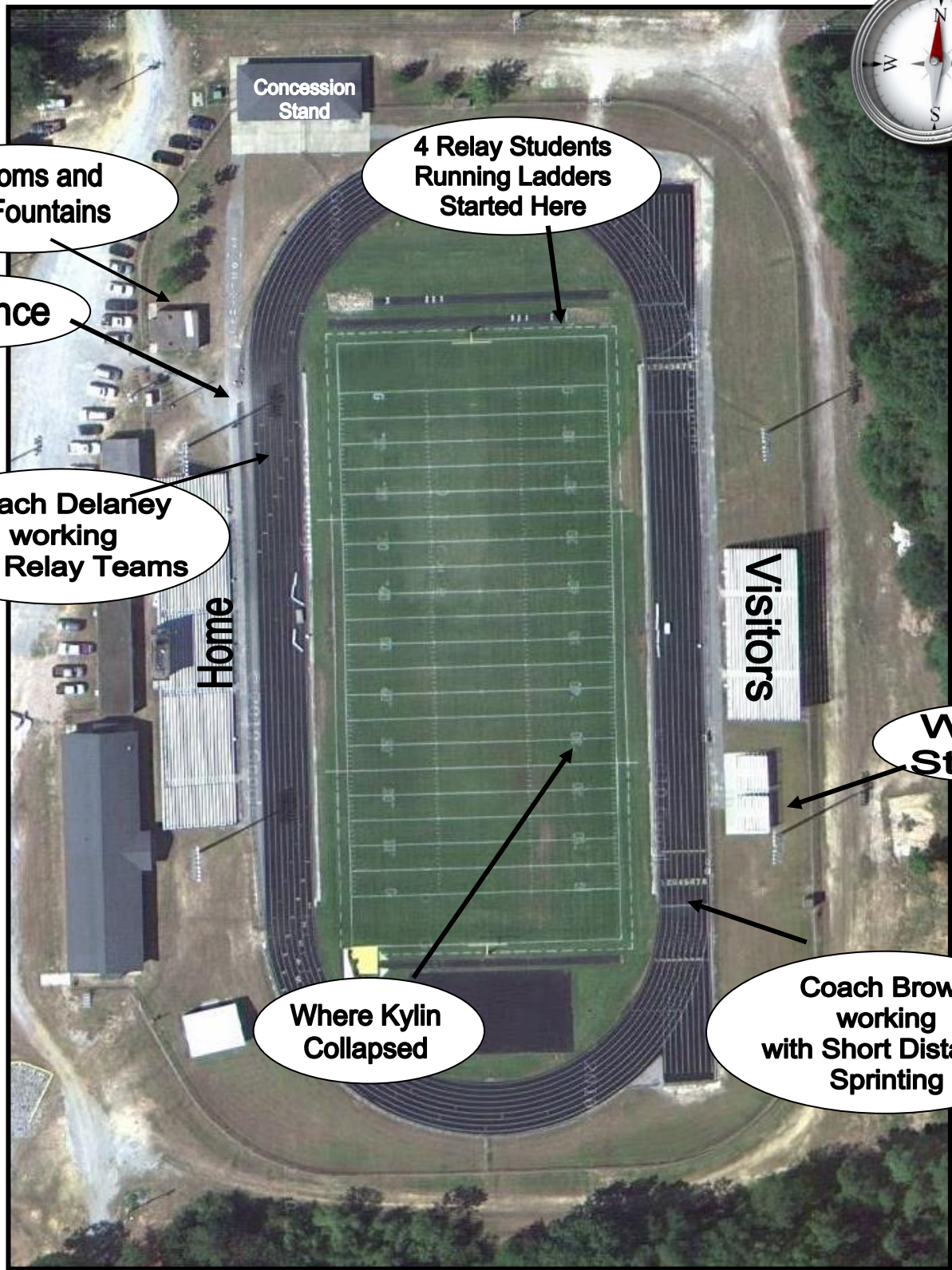
Recent reports indicate Strenaxal may be closely linked to causing heart problems and even death. The use of Strenaxal has been temporarily suspended until further studies on the long-term heart risks associated with the medication can be confirmed.

News of such reports as medication causing death can be alarming; however, there is no current proof the medication causes fatal heart attacks or contributes to heart-related injuries. Strenaxal has been on the market for thirty years giving enough data to show patients taking Strenaxal as young children today would be in their 40s and 50s with no significant problems tied directly to the use of this medication reported.

The alert is being made about the use of Strenaxal after the FDA received reports of unexplained death in individuals taking the medication. The Strenaxal medication label provides a warning for potential abuse indicating amphetamines have a high potential for abuse; prolonged administration may lead to dependencies. In addition, misuse of amphetamines may cause sudden death and serious cardiovascular adverse reactions.

Strenaxal is an amphetamine primarily used for treating Attention Deficit Hyperactivity Disorder (ADHD) and anxiety in children and adults. The medication is also available in a generic form by various companies.

Exhibit #9: Aerial View of Track/Artificial Turf Football Field and Track Practice Locations on August 8, 2024



Concession Stand



Restrooms and Water Fountains

4 Relay Students Running Ladders Started Here

Entrance

Coach Delaney working with Relay Teams

Home

Visitors

Water Station

Where Kylin Collapsed

Coach Brown working with Short Distance Sprinting

Exhibit #10: Autopsy Report on Kylin Abbott

STATE OF SOUTH CAROLINA - SOUTH CAROLINA BUREAU OF INVESTIGATIONS DIVISION OF FORENSIC SCIENCES - RECORD OF CORONER					
Name of Deceased	Kylin Abbott	County	Taylor		
Age	17	Date of Birth	08/25/2006		
Height	66"	Date of Death	08/08/2024		
Weight	145 lbs.	Time of Death	10:23pm		
MANNER OF DEATH					
<input type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input type="checkbox"/> Accident <input checked="" type="checkbox"/> Undetermined <input type="checkbox"/> Other					
PURPOSE OF REPORT					
<input checked="" type="checkbox"/> Autopsy <input type="checkbox"/> Limited Dissection <input type="checkbox"/> External Exam <input type="checkbox"/> History Review					
PERFORMED BY	Cameron Covington, M.D.	Date	08/09/24	Hour	12:05pm
SIGNED	Cameron Covington, M.D.	Date	08/10/24		
APPROVED	Stephan Bonner, M.D.	Date	08/16/24		
CAUSE OF DEATH					
External Examination:					
The body is that of a juvenile, approximately 66" in height, and weighing 145 lbs., consistent with the stated age of 17 years.					
Internal Examination:					
The following excludes the described injuries. The soft tissues and typically positioned viscera lack unusual odor or atypical color. The soft tissues have normal appearance with minimal decomposition.					
<ul style="list-style-type: none"> • Cardiovascular: The heart is normal size and weight for patient's age and appears structurally normal. • Respiratory: The lungs appear to be normal size and weight. Tissue appears to be normal. • Hepatobiliary: The liver appears to be normal. • Gastrointestinal: The typically formed tongue, esophagus, gastroesophageal junction, serosal stomach, and gastric mucosa are without note. The stomach, large bowels, and small bowels appear normal. • Toxicology: Strenaxal found in the bloodstream. 					
Other Procedures:					
<ol style="list-style-type: none"> 1. Documentary photographs are obtained. 2. Blood, urine, bile, and vitreous are submitted for toxicological analysis. 3. Blood is submitted for serological analysis. 4. Head and body hair is submitted. 5. Clothing is submitted for volatile determination. 					
Autopsy Findings: At the time of death, this was an otherwise healthy 17-year-old showing no evidence of trauma.					
Cause of Death: Total organ failure as a result of severe dehydration.					

Exhibit #11: Southern Carolina High School Guidelines on Heat Stress and Athletic Participation

Southern Carolina High School Guidelines on Heat Stress and Athletic Participation

There are no excuses for heatstroke deaths if proper precautions are taken.

Consider the following:

- Heat cramps, weakness, fatigue, exhaustion (water depletion or salt depletion), stroke.
- Remember, the temperature may appear warmer than the stated temperature. When applicable, use the heat index rather than the actual temperature when evaluating conditions for a practice, game, etc.
- If heat the index exceeds 100, take proper precautions.

Precautions to be taken:

- Every athlete should have a physical examination with a medical history when first entering a school sport related program and an annual health history update.
- Athletes should be in their best possible physical condition.
- Acclimate players to the heat gradually.
- Players must have access to water and be readily available at all times with unlimited quantities. It is recommended that a minimum 10-minute water break be scheduled every twenty minutes of activity in hot conditions.
- Water breaks two or three times every hour are better than one break an hour.



Trouble Signs of Problems Related to Heat:

- Cramps
- Weakness / Fatigue
- Exhaustion (from water depletion, salt depletion, overexertion)
- Vomiting
- Weak or Rapid Pulse
- Visual Disturbance
- Unsteadiness, dizziness




Action Steps for Victims of Heat:

- Do **NOT** Delay – delays can be fatal!
- Know First Aid
- Have access to a phone to call 911 immediately
- Immerse the victim in ice/cold water.
- If the victim cannot be immersed, apply ice packs to the armpits, groin, and neck areas and continue until EMS arrives.
- Give fluids if athlete is able to swallow and is conscious.


Exhibit #12: Social Media Posting

 **Sharon Williams** is with Frankie Fulton at Southern Carolina High School.
August 9, 2023 · 

When Coach Delaney thinks you're being lazy and ignores the fact that it's August in South Carolina and the heat index on the track is 100+ degrees. 😓

   56 6



 Like  Comment  Share

 **Frankie Fulton** And it was even hotter on the field! I definitely wasn't feeling so great.  4


Haha · Reply · 1h



 **Sharon Williams** I remember Coach making me run ladders in March and they were bad enough then! I bet all the water in the world wasn't helping your cramps! Did you at least stop feeling so dizzy by the time practice was over?  3

Like · Reply · 1h



 **Frankie Fulton** Nope. Felt bad all the way through the ladders Coach D made us do. I'll for sure be focused on passing the baton tonight- I don't want be a "butterfingers" and have to run on that turf and get so hot that I feel bad again! Gotta be sure I get in a strong practice in case any scouts are there!  2

Like · Reply · 1h


 **Roger Smith** Coach D was pretty angry at y'all for struggling with the baton. I think he's gotten harsher with our team as our competition year has gone on. Like maybe he should let the people running ladders take a water break when they need one instead of calling them babies and lazy and making them wait an hour???

  5

Like · Reply · 1h

 **Frankie Fulton** Agreed! I know having to run ladders is punishment for the relay team but 😓 .See you at practice later!  1

Like · Reply · 1h

 Write a comment... 