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May 23 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Appellate Case No. 2022-001218

Joseph P. Sellaro,.....Respondent,

v.

The South Carolina Department of Social Services and the Richland County
Sheriff's Department, Defendants,

Of which the South Carolina Department of Social Services is theAppellant.

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

Respondent Joseph P. Sellaro designates the following to be included in the Record on
Appeal, including any necessary redactions (Supreme Court Order 2014-04-15-02):

1. Notice of Appeal, filed August 30, 2022
2. Form 4 Order, filed August 3, 2022
3. Complaint, filed August 31, 2016
4. Answer of DSS, filed October 10, 2016
5. Answer of RCSD, filed October 11, 2016
6. Verdict form, filed May 23, 2022
7. DSS Motion for JNOV, or alternatively, motions for new trial absolute and/or new trial nisi remittitur, filed May 31, 2022
8. Plaintiff’s Reply to Motions for JNOV, or alternatively motions for new trial absolute and/or new trial nisi remittitur, filed July 8, 2022

9. Trial transcript, May 16-19, 2022: pp. 1-10, 104-109, 113-128, 143-155, 185, 188-205, 225-227, 229-253, 300-305, 309-324, 343-368, 376-410, 417-428, 456, 459-462, 466-476, 479-495, 500-517, 521-572, 574-598, 601-728, 730-732, 768-788, 811-833, 834-870

a. Redact date of birth on Tr. p. 401 ln. 18.

10. Trial Exhibits:

- a. Plaintiff's Exhibit 2 – GAL report
- b. Plaintiff's Exhibit 3 – Bench order, filed March 7, 2016
- c. Plaintiff's Exhibit 4 – Affidavit of Victoria Deas-Johnson, filed March 4, 2016
- d. Plaintiff's Exhibit 7 – Palmetto Health Richland hospital records
- e. Plaintiff's Exhibit 8 – March 1, 2016 hearing transcript, all pages
- f. Plaintiff's Exhibit 9 – hospital bill
- g. RCSD Exhibit 1 – Seventy-Two Hour Hearing Order
- h. DSS Exhibit 4 – faxed medical records

11. Transcript of hearing on July 28, 2022: all pages

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

Respectfully submitted,

s/Kathleen C. Barnes

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May 23, 2023