

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**Aug 14 2023**

**SC 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 the .....Appellant.

RESPONDENT'S CONSENT MOTION TO AMEND DESIGNATION OF MATTER AND  
FILE SUPPLEMENTAL RECORD ON APPEAL

Respondent Joseph P. Sellaro moves to amend his designation of matter for the record on appeal with six pages of the trial transcript mistakenly omitted from Respondent's original designation but cited in Respondent's brief. The amended designation is filed with this motion. Appellant consents to this request. *See* Exh. to motion.

Respondent also moves to file a supplemental record on appeal, and files the supplement with this motion. Appellant consents to this as well. *See* Exh. to motion.

Respectfully submitted,

s/Kathleen C. Barnes  
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**From:** [Andrew Lindemann](#)  
**To:** [Kathleen Barnes](#)  
**Cc:** [Jennifer Baker](#); [lawyer@paigebgeorge.com](#); [ksb@brownandbrehmer.com](#)  
**Subject:** RE: Sellaro v. SCDSS - Record supplement  
**Date:** Saturday, August 12, 2023 11:49:11 AM

Kathleen, that is fine. I will consent to the motion and the supplemental designation.

Andrew

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**From:** Kathleen Barnes <[kbarnes@barneslawfirm.com](mailto:kbarnes@barneslawfirm.com)>  
**Sent:** Saturday, August 12, 2023 8:05 AM  
**To:** Andrew Lindemann <[Andrew@ldlawsc.com](mailto:Andrew@ldlawsc.com)>  
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**Subject:** Sellaro v. SCDSS - Record supplement

Andrew,

I hope you are doing well. In preparing our final brief, I realized that we cited to six pages of the record in our brief that we did not designate for the record on appeal. Would you consent to a motion to file a supplemental designation? If so, we can take care of filing a supplemental record with the pages because it was my oversight and I know you are starting a trial on Monday. The pages are Tr. pp. 733-34, 754-55, 765-66. They are cited on pages 20-21 of our brief.

Thank you,

Kathleen



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