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**Nov 01 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Maite Murphy, Circuit Court Judge

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Circuit Court Case Number 2017-CP-18-02001

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Kaci May and Kaci May as guardian  
ad litem for A.R.M., J.H.M., J.T.M.,  
C.B.M., J.R.M., and J.W.M.,

Appellants,

v.

Dorchester School District Two,  
South Carolina Department of Social  
Services, Michael Leach, and Jasmine  
Flemister.

Respondents,

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**SUPPLEMENTAL RECORD ON APPEAL**

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Department of Social Services, Michael Leach, and  
Jasmine Flemister

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**SUPPLEMENTAL RECORD ON APPEAL**

Motion filed September 27, 2017 in Family Court by Kaci and Warren May. . . . .	001
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STATE OF SOUTH CAROLINA  
COUNTY OF DORCHESTER

South Carolina Department of Social  
Services,

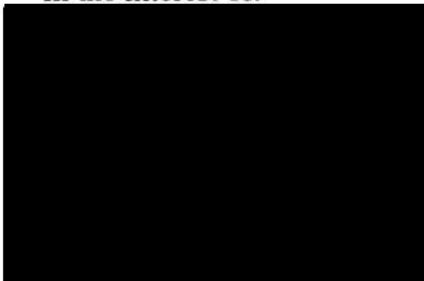
Plaintiff,

v.

Kaci May and Warren May,

Defendants,

In the interest of:



Minors under the age of 18.

IN THE FAMILY COURT OF THE  
NINTH JUDICIAL CIRCUIT

Case No.: 2017-DR-18-01334

**NOTICE OF MOTION AND  
MOTIONS**

**TO: PLAINTIFF SCDSS AND ITS COUNSEL, DEANNE M. GRAY:**

**NOTICE**

YOU WILL PLEASE TAKE NOTICE that on October 12, 2017 at 1:30 p.m. at the  
Dorchester County Family Court, 212 Deming Way, Summerville, South Carolina, Defendants  
request the following relief.

**MOTION**

Plaintiff seeks an Order of the Court granting the following relief:

- A. An order unsealing all SCDSS files and the adoption records of J. [REDACTED] M. [REDACTED]  
[REDACTED] M. [REDACTED], and L. [REDACTED] M. [REDACTED] pursuant to S.C. Code Ann. § 63-9-780 for use in this  
litigation;

- B. An order striking Plaintiff SCDSS's Court Information Sheet, filed September 14, 2017, as it is an ex parte communication with the court, it contains unverified allegations and inadmissible evidence;
- C. An order forbidding SCDSS from filing Court Information Sheet's in the future because the documents are ex parte communications and they contain unverified allegations and inadmissible evidence;
- D. Motion to stay the trial of this matter until Defendant Warren May returns from his deployment to Afghanistan in May 2018;
- D. An order restraining SCDSS from interrogating Defendants' children at school;
- E. Granting such other and further relief as this Court deems just and proper.

THE FOSTER CARE ABUSE LAW FIRM, PA

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Robert J. Butcher  
S.C. Bar Numbers 74029  
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Manning, South Carolina 29102  
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September 27, 2017  
Manning, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

South Carolina Department of Social  
Department,

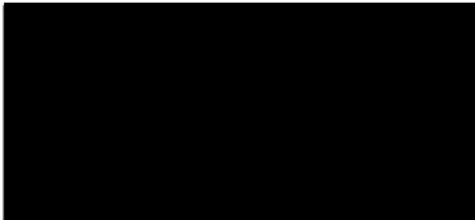
Plaintiff,

v.

Kaci and Warren May

Defendants.

In the Interest of:



Minors under the age of eighteen (18) years of  
age.

IN THE FAMILY COURT OF THE  
FIRST JUDICIAL CIRCUIT

Case No.: 2017-DR-18-01334

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that she is paralegal to the attorney for the Plaintiff in the above stated case; that she has this 5<sup>TH</sup> day of October 2017 served the following:

- 1-Motion and Order Information Form Coversheet**
- 2-Notice of Motion and Motions**
- 3-Certificate of Service**

The same was emailed to Mary Lee Briggs at [marylee@briggsandinglese.com](mailto:marylee@briggsandinglese.com) and mailed to Deanne Gray by depositing same in an authorized United States mailbox; that the envelope containing said document was property addressed, securely wrapped and sealed, and bore the proper postage; and the said envelope was addressed to the following:

Deanne M. Gray  
216 Orangeburg Rd  
Summerville SC 29483

Mary Lee Briggs  
[marylee@briggsandinglese.com](mailto:marylee@briggsandinglese.com)



---

Tiffany Parnell  
Paralegal  
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Manning, South Carolina 29102

**Deborah J. Butcher**  
**[dbutcher@camdensc-law.com](mailto:dbutcher@camdensc-law.com)**

**Robert J. Butcher**  
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**Post Office Box 486**  
**Manning, South Carolina,**  
**29102**

**Phone: (803) 432-7599**  
**Fax: (803) 432-7466**

**October 5, 2017**

Deanne M. Gray  
SCDSS  
216 Orangeburg Rd  
Summerville, South Carolina 29483

RE: SCDSS v. May (2017-DR-18-01334)

Dear Ms. Gray

Enclosed please find an unfiled copy of the following:

- 1-Motion and Order Information Form Coversheet
- 2-Notice of Motion and Motions
- 3-Certificate of Service

Should you have any questions or concerns, do not hesitate to contact us directly at 803-432-7599.

Sincerely yours,

  
Tiffany Parnell  
Paralegal

Encl.

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF DORCHESTER )  
 )  
 )  
South Carolina Department of Social Services, )  
 Plaintiff, )  
 vs. )  
 )  
Kaci May and Warren May, )  
 Defendant. )

IN THE FAMILY COURT  
NINTH JUDICIAL CIRCUIT

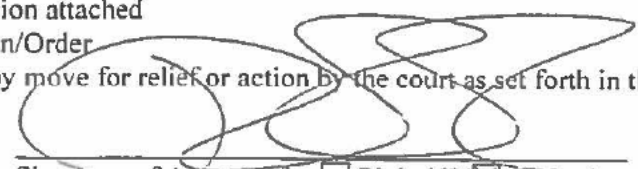
**MOTION AND ORDER INFORMATION  
 FORM AND COVERSHEET**

Docket No. 2017-DR-18-01334

Plaintiff's Attorney: <u>Deborah J. Butcher, Bar No. 74029</u> Address: <u>221 Glenwood Drive, Manning, SC 29102</u> Phone: (803) 432-7599 Fax (803) 432-7466 E-mail: <u>dbutcher@camdensc-law.com</u> Other:	Defendant's Attorney: <u>Deanne M. Gray, Bar No. _____</u> Address: <u>216 Orangeburg Road, Summerville, 29483</u> Phone: (843) 486-1863 Fax _____ E-mail: _____ Other:
--	--

MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)  
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)  
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

**SECTION I: Hearing Information**  
 Nature of Motion: Motion for Various Forms of Relief  
 Estimated Time Needed: 15 minutes Court Reporter Needed:  YES /  NO

**SECTION II: Motion/Order Type**  
 Written motion attached  
 Form Motion/Order  
 I hereby move for relief or action by the court as set forth in the attached proposed order.  
  
 Signature of Attorney for  Plaintiff /  Defendant September 27, 2017  
Date submitted

**SECTION III: Motion Fee**  
 PAID - AMOUNT: \$ \_\_\_\_\_  
 EXEMPT: (check reason)
 

<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support	<input checked="" type="checkbox"/> Domestic Abuse or Abuse and Neglect
<input type="checkbox"/> Indigent Status	<input type="checkbox"/> State Agency v. Indigent Party
<input type="checkbox"/> Sexually Violent Predator Act	<input type="checkbox"/> Post-Conviction Relief
<input type="checkbox"/> Motion for Stay in Bankruptcy	
<input type="checkbox"/> Motion for Publication	<input type="checkbox"/> Motion for Execution (Rule 69, SCRCP)
<input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions	
Name of Court Reporter: _____	
<input type="checkbox"/> Other: _____	

<b>JUDGE'S SECTION</b> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other:	JUDGE CODE _____ Date: _____  Judge Signature: _____
--	--

**CLERK'S VERIFICATION**  
 Collected by: \_\_\_\_\_ Date Filed: \_\_\_\_\_  
 MOTION FEE COLLECTED: \$ \_\_\_\_\_  
 CONTESTED - AMOUNT DUE: \$ \_\_\_\_\_

Custodial Parent (if applicable): \_\_\_\_\_

The undersigned hereby certifies that the Supplemental Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

**RECEIVED**

**Nov 01 2021**

**SC Court of Appeals**

Respectfully submitted,

**FOSTER CARE ABUSE LAW FIRM, PA**

s/Robert J. Butcher

Robert J. Butcher - 74722

Deborah J. Butcher - 74029

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Camden, South Carolina  
November 1, 2021