

RECEIVED

Jan 03 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Union County
Court of Common Pleas

Honorable Daniel D. Hall

Appellate Case No. 2023-001049

Jane and John Smith, individually and as
Guardians of THE CHILD, and THE CHILD Individually,
Appellants,

v.

South Carolina Department of Social Services,
South Carolina Department of Children's Advocacy,
Tammy Gaye Causey Dalsing and
Edward Anthony Dalsing,
Respondents.

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondents Tammy Gaye Causey Dalsing and Edward Anthony Dalsing propose the following be included in the Record on Appeal:

1. Aug. 28, 2013 Family Court Order.
2. Oct. 9, 2013 Family Court Order.
3. Nov. 6, 2013 Family Court Order.
4. Feb. 19 2014 Family Court Order.
5. June 4, 2014 Complaint of Respondents Edward Dalsing and Tammy Dalsing.
6. June 4, 2014 Family Court Order.

7. July 16, 2014 Family Court Order.
8. Aug. 27, 2014 Family Court Order.
9. Jan. 13, 2015 Family Court Order.
10. Mar. 12, 2015 Family Court Order.
11. Dec. 16, 2015 Family Court Order.
12. Sept. 21, 2016 Family Court Order.
13. Dec. 7, 2016 Family Court Order.
14. Feb. 10, 2017 Motion for Emergency Relief of Appellants.
15. Feb. 22, 2017 Family Court Order.
16. Dec. 4, 2017 Family Court Order.
17. Jan. 5, 2018 Complaint of Appellants.
18. May 25, 2018 Family Court Order.
19. Oct. 16, 2018 Motion to Dismiss Action and Withdraw from Intervention of Respondents Edward Dalsing and Tammy Dalsing.
20. Oct. 17, 2018 Return of Appellants to the Motion to Dismiss and Withdraw from Intervention of Respondents Edward Dalsing and Tammy Dalsing.
21. Nov. 14, 2018 Family Court Order.
22. Jan. 23, 2019 Family Court Order.
23. Sept. 21, 2020 Order of the South Carolina Administrative Court, S.C. Admin. Ct. Case No. 47-OHAN.
24. Mar. 11, 2020 Appellants' Complaint.
25. Mar. 25, 2020 Appellants' Amended Complaint.
26. Dec. 2, 2022 Motion for Summary Judgment of Respondent SCDSS.
27. Dec. 2, 2022 Motion for Summary Judgment of Respondents Edward Dalsing and Tammy Dalsing.
28. May 22, 2023 Respondents Edward Dalsing and Tammy Dalsing's Memorandum in Support of their Motion for Summary Judgment and all Exhibits submitted to the Court.
29. May 25, 2023 Transcript.
30. June 30, 2023 Order.
31. July 3, 2023 Order.
32. July 3, 2023 Notice of Appeal.
33. July 10, 2023 Amended Notice of Appeal.
34. Jan. 9, 2015 Jennifer Cooper Deposition. (57:4-18; Ex. 7; Ex. 10; Ex. 11.)
35. Oct. 24, 2018 Lousie Cooper Deposition. (Ex. 2.)
36. Oct. 14, 2022 Monique Mitchell Deposition. (126:8-11.)
37. Mar. 2, 2023 Affidavit of Lousie Cooper. (Ex. A.)
38. Dec. 2, 2022 Affidavit of Jesse Kaylor. (¶ 5-11; Ex. A; Ex. B; Ex. C; Ex. D; Ex. E; Ex. F.)
39. Dec. 2, 2022 Affidavit of Nicole Stolar-Peterson. (¶ 5-10.)
40. Mar. 2, 2023 Affidavit of Elizabeth Tisdale. (Ex. A.)

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

s/ P. Christopher Smith, Jr.

James P. Walsh (SC Bar #15180)

P. Christopher Smith, Jr. (SC Bar #74086)

CLARKSON, WALSH & COULTER, P.A.

P.O. Box 6728

Greenville, SC 29606

Phone: (864) 232-4400

jwalsh@clarksonwalsh.com

csmith@clarksonwalsh.com

Attorneys for Respondents Tammy Gaye Causey Dalsing and
Edward Anthony Dalsing

And

L. Dale Dove, Esquire (SC Bar #1735)

THOMPSON DOVE LAW GROUP

P.O. Box 907

Rock Hill, SC 29731

(803) 327-1910

dale@tdlawgroup.com

Attorneys for Respondents Tammy Gaye Causey Dalsing and
Edward Anthony Dalsing