

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from **Union** County Family Court
Honorable Daniel Hall

H.A., by and through her guardians, Jane and John Smith, and Jane and John Smith, individually, Appellants,

v.

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

Appellate Case No.: 2023-001049

MOTION TO RECONSIDER

Comes Now, Appellants, and motions this Court to Reconsider it’s Order issued on March 5, 2025 denying the Appellants’ motion to unseal the file because the lower court case number was not named in the body of the motion and the items requesting to unseal were not named. The Order was issued without prejudice. As mentioned in the order, no return was made to the Motion to Unseal.

Grounds for this Motion to Reconsider:

At the trial/summary judgment motion hearing, the Respondents South Carolina Department of Social Services and South Carolina Department of Children’s Advocacy, sought to seal numerous records in the Clerk’s file. The motion was not objected to and was granted. Subsequently, the Appellants listed on their Designation of Matter to this Court, all documents which were submitted to the lower court “under seal.” Essentially, the lower court’s order entitled “Order to File Confidential Records Under Seal” filed on May 26, 2023 made numerous documents and excerpts of documents

confidential and sealed, including depositions, affidavits, forensic interviews of the abuse of the child. (See the attached Index although this list is not all inclusive of what the Court actually sealed at the hearing). Wherefore, Appellants seek for this Court to issue an Order directing the Clerk of Court to unseal the file at 2020-CP-44-00104 so that Appellants may gather the documents necessary to complete the Record on Appeal. Further, Appellants ask the time frames be stayed for filing the Record on Appeal, until this Motion is ruled upon.

Respectfully submitted,

s/ *Melinda Butler*

Melinda Butler
Counsel for Appellants
S.C. Bar No. 78040
BUTLER LAW FIRM, LLC
211 E. Main Street
Union, South Carolina 29379

March 13, 2025

RECEIVED

Mar 13 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

Jane and John Smith individually and as Guardians of H.A. and H.A. individually,
Appellants,

v.

South Carolina Department of Social Services, South Carolina Department of
Children's Advocacy, Tammy Gay Causey Dalsing, Edward Anthony Dalsing,

Respondents.

Of whom Darryl & Ruth Armstrong are the Appellants.

Appellate Case No. 2023-001049

PROOF OF SERVICE

I, Melinda Butler, hereby certify that I have served a copy of the

Motion to Reconsider

on the below stated parties at the stated email AND/OR postal address as indicated below, by attaching
a copy of same, on March 13, 2025 addressed as follows:

P. Christopher Smith, Jr.
csmith@clarksonwalsh.com

Stephanie Burton
sburton@gibbesburton.com

L. Dale Dove
dale@tdlawgroup.com

James Walsh
jwalsh@clarksonwalsh.com

Respectfully submitted,

_____s/ *Melinda Butler*

Melinda Butler

S.C. Bar No. 78040
BUTLER LAW FIRM, LLC
211 E. Main Street
Union, South Carolina 29379
(864) 427-8805
(864-427-8815 (fax))

March 13, 2025



BUTLER LAW FIRM



Your Journey to Justice

March 13, 2025

South Carolina Court of Appeals
Jenny Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina 29211

Re: H.A., by and through her guardians, Jane and John Smith, and Jane and John Smith individually, Appellants, vs. South Carolina Department of Social Services, South Carolina Department of Children's Advocacy, Tammy Gaye Causey Dalsing and Edward Anthony Dalsing, Respondents.: 2023-001049

Dear Clerk:

Please find enclosed:

1. Motion to Reconsider
2. Exhibit (Index)
3. Proof of Service
4. Check in the amount of \$50.00

Thank you for your help in this matter.

Sincerely yours,

Melinda Butler

cc: Client
Attorney Stephanie Burton
Attorney Christopher Smith
Attorney L. Dale Dove
Attorney James P. Walsh

Union Location

211 E. Main Street
Union, SC 29379
(864) 427-8805

Laurens Location

328 Hillcrest Dr, Ste. 2
Laurens, SC 29360
(864) 715-2652