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May 28 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 H.A., and H.A. 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.

RESPONDENTS TAMMY GAYE CAUSEY DALRING
AND EDWARD ANTHONY DALRING'S
MOTION TO SUPPLEMENT THE RECORD

Respondents Tammy Gaye Causey Dalsing and Edward Anthony Dalsing (Dalsings), pursuant to Rule 212(b), SCACR, move the Court to order Appellants to supplement the Record on Appeal with the items requested in this motion and, further, order that Dalsing Respondents' Final Brief deadline be held in abeyance until 15 days after the Record on Appeal is supplemented and completed. In support of this motion, the Respondents show the following to the Court:

1. Dalsing Respondents' Initial Brief was filed with this Court on January 3, 2025.
2. Dalsing Respondents' Designation of Matter was filed with this Court on January 3, 2025.
3. South Carolina Department of Social Services ("SCDSS") Respondent's Initial Brief was filed with this Court on December 2, 2024.
4. SCDSS Respondent's Designation of Matter was filed with this Court on December 2, 2024.
5. Appellants' Initial Brief was filed with in this Court on November 1, 2024.
6. Appellants' Designation of Matter was filed with this Court on November 1, 2024.
7. Pursuant to Rule 210, a Record on Appeal was created for this case.
8. Pursuant to Rule 211(b)(1), Dalsing Respondents began the process of revising the Final Brief to indicate where the material appears in the Record on Appeal.
9. The Appellants, however, inadvertently left out the items listed in Number "10" below, even though the items were included in either SCDSS Respondent's Designation of Matter or Dalsing Respondents' Designation of Matter.
10. The Record on Appeal does not include the following items:
 - a. T. Dalsing [Tammy Dalsing] Dep. 54:16-23; 107:21; 108:1; and 108:14-17, which were included in SCDSS Respondent's Designation of Matter number 39.
 - b. J. Cooper [Jennifer Cooper] Dep. 57:4-18, which was included in Dalsing Respondents' Designation of Matter number 34.
 - c. D. Appellant [Darrel Armstrong] Dep. 129:16-23, which was included in SCDSS Respondent's Designation of Matter number 33.
 - d. Deposition of Mrs. Appellant [Ruth Ann Armstrong] Vol. 1 at pages 59-62; 114; 132; 170-173; and 315-318 which were included SCDSS Respondent's Designation of Matter number 34.
 - e. Deposition of Mrs. Appellant [Ruth Ann Armstrong] Vol. 2 at pages 50:14 to 50:22; 63:13 to 63:19; and 318-319 SCDSS Respondent's Designation of Matter

number 35.

- f. ALL Exhibits to the Dalsings' Memorandum which were included in Dalsing Respondents' Designation of Matter number 28.
- g. L. Cooper [Louise Cooper] Aff. Ex. A which was included in Dalsing Respondents' Designation of Matter number 35.
- h. Sept. 21, 2020, Order, Tammy Dalsing v. South Carolina Dep't of Soc. Servs., S.C Admin. Ct. Case No. 47-OHAN which was included in Dalsing Respondents' Designation of Matter number 23.
- i. Initial Brief of Appellants [regarding the May 25, 2023, motion hearing].
- j. Transcript of Monique Mitchell which was included in Dalsing Respondents' Designation of Matter number 36.

11. As such, if the Respondent Dalsing's Final Brief were submitted to the Court at this time, the Final Brief would include references to material outside of the record and, therefore, would not comply with Rule 211(b)(1).

12. Thus, Pursuant to Rule 212, Dalsing Respondents respectfully request this Court to order the Appellants to supplement the Record on Appeal with the documents listed in Number "10" above so that the Dalsing Respondents' Final Brief may comply with Rule 211(b)(1).

13. Dalsing Respondents further respectfully request this Court to order that Dalsing Respondents' Final Brief deadline be held in abeyance until 15 days after the Record on Appeal is supplemented and completed.

Respectively Submitted,

CLARKSON, WALSH, & COULTER, P.A.

s/James P. Walsh

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Causey Dalsing and Edward Anthony Dalsing

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PROOF OF SERVICE

I, James P. Walsh, hereby certify that my office has served a copy of

RESPONDENTS TAMMY GAYE CAUSEY DALSSING AND EDWARD ANTHONY

DALSING'S MOTION TO SUPPLEMENT THE RECORD on the below stated parties at

the stated e-mail address as indicated below, by attaching a copy of same, on May 28, 2025,
addressed as follows:

Melinda Butler: melinda@butlerservingjustice.com

Stephanie Burton: sburton@gibbesburton.com

Dale Dove: Dale@tdlawgroup.com

South Carolina Court of Appeals Filings: ctappfilings@sccourts.org

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