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Jun 23 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

MOTION TO FILE SUPPLEMENTAL RECORD ON APPEAL

I, Melinda Butler, hereby motion the Court to allow the filing of a Second and Third Supplemental Record on Appeal. After the filing of the initial Record on Appeal, it was brought to my attention by Opposing Counsel that some items were inadvertently omitted. The Second Supplemental is ready and has been delivered to this Court as well as to the other Counsel. The Third Supplemental is being prepared and I am requesting an additional twenty(20) days to file the same, thereby staying the time frames for submission of all parties' final briefs.

Respectfully submitted,

s/ Melinda Butler

Melinda Butler
Counsel for Appellant
S.C. Bar No. 78040
BUTLER LAW FIRM, LLC

June 23, 2025
Union, South Carolina

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PROOF OF SERVICE

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

1. Motion to file Third Supplemental Record on Appeal

on the below stated parties via email and U.S. Mail at the addresses listed below, on June 23,

2025 addressed as follows:

P. Christopher Smith, Jr./L. Dale Dove
Attorney for Tammy and Edward Dalsing
1164A Woodruff Road
Greenville, SC 29606

Stephanie Burton, Larry Gregg
Attorney for SCDSS and SCDC
308 East St. John Street
Spartanburg, SC 29302

s/Melinda Butler
Melinda Butler, 78040
Butler Law Firm, LLC

June 23, 2025



BUTLER LAW FIRM



Your Journey to Justice

Via email and U.S. Mail: ctapp@sccourts.org

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SC Court of Appeals

June 23, 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
2. Proof of Service
3. Check in the amount of \$50.00

Thank you for your help in this matter.

Sincerely yours,

s/ *Melinda Butler*
Melinda Butler

cc: Client
Larry Gregg
Stephanie Burton
Dale Dove
Chris Smith

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