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Jul 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

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
SECOND 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 some critical items, even though the items were included in either SCDSS Respondent's Designation of Matter or Dalsing Respondents' Designation of Matter.
10. Subsequently, Motions to Supplement have been filed and the parties have worked together to attempt to complete the record.
11. Appellants' counsel has subsequently filed a Supplemental Record, Second Supplemental Record and Third Supplemental Record.
12. However, while preparing our Final Brief, we determined that the Appellants inadvertently left out four (4) pages when preparing the Third Supplemental Record.
10. Currently, the entire Record on Appeal does not include the following items which were designated: Deposition of Mrs. Appellant [Ruth Ann Armstrong] Vol. 2 at pages 264, 265, 313, and 314.
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. Appellants have agreed to supplement the Record on Appeal and are in the process of doing so.

14. 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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Attorneys for Respondents Tammy Gaye

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 SECOND 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 July 23, 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

Respectively Submitted,

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