

STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
COURT OF COMMON PLEAS

The Honorable Brian M. Gibbons, Judge

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Appellate Case No. 2014-002254

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**RECEIVED**

FEB 23 2016

SC Court of Appeals

BLH by parents/general guardians Kenneth and Angela Hensley, and on behalf of all others similarly situated, Respondent,

v.

South Carolina Department of Social Services, Appellant.

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**RESPONDENT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL**

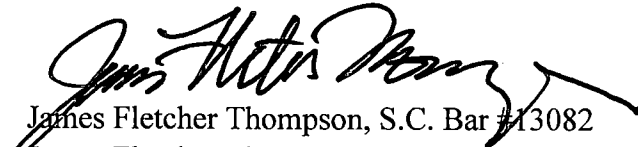
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Respondent proposes the following to be included in the Record on Appeal:

1. Order of Judge Brian M. Gibbons filed April 8, 2014
2. Order of Judge Brian M. Gibbons filed May 29, 2014 on Plaintiff's Motion for Class Certification
3. Amended Order of Judge Brian M. Gibbons filed September 16, 2014 on Plaintiff's Motion for Class Certification
4. Order of Judge Brian M. Gibbons filed April 30, 2014 on Defendant's Motions for Reconsideration
5. Complaint filed April 1, 2013
6. Plaintiff's Discovery Requests served July 26, 2013
7. Plaintiff's Motion to Compel
8. Plaintiff's Motion for Class Certification
9. Plaintiff's Memorandum in Support of Motion for Class Certification
10. Defendant's Motion to Alter or Amend filed April 28, 2014
11. Defendant's Motion to Alter or Amend filed July 31, 2014
12. Defendant's Motion to Alter or Amend filed September 26, 2014

13. Defendant's Motion for Summary Judgment with attachments
14. Transcript of February 27, 2015 hearing, pp. 15-16
15. Plaintiff's emails following up on discovery requests served July 26, 2013
16. Email from Andrew Lindemann to Judge Brian Gibbons dated April 1, 2015
17. Email reply from Judge Brian Gibbons to Andrew Lindemann dated April 1, 2015
18. Proposed order and cover letter to Judge Brian Gibbons dated April 1, 2015
19. Email from Andrew Lindemann to Judge Brian Gibbons dated April 3, 2015

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



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February 18, 2016

Attorneys for Respondent

STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
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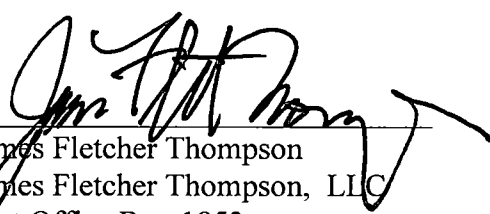
South Carolina Department of Social Services, Appellant.

**CERTIFICATE OF SERVICE**

I certify I have served the Respondent's Initial Brief and Designation of Matter to be  
Included in the Record on Appeal on all counsel of record by depositing a copy of it in  
the United States Mail, postage prepaid, on February 18, 2016, addressed as follows:

Andrew F. Lindemann, Esquire  
Joel S. Hughes, Esquire  
Post Office Box Box 8568  
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February 18, 2016

Attorney for Respondent



THE LAW OFFICES OF  
**JAMES FLETCHER THOMPSON**

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CIVIL LITIGATION \* ADOPTION \* SURROGACY

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February 18, 2016

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FEB 23 2016

**SC Court of Appeals**

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

RE: BLH by parents/general guardian Kenneth and Angela Hensley, and on behalf of all others similarly situated v. South Carolina Department of Social Services  
Appellate Case No. 2014-002254

Dear Ms. Kitchings:

Please find enclosed the one copy of the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal. I am also enclosing a Certificate of Service evidencing service of Respondent's Initial Brief and Designation of Matter on Appellant's counsel of record.

With respect and kind regards, I am,

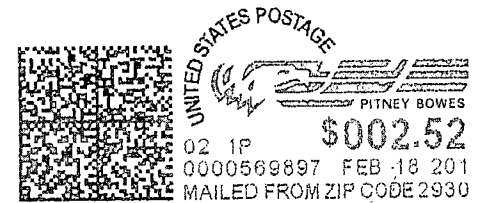
Sincerely,

  
JAMES FLETCHER THOMPSON

JFT/mhw

Enclosures

cc w/enclosures: Andrew F. Lindemann, Esq.  
Joel Steve Hughes, Esq.  
T. Ryan Langley, Esq.



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The Honorable Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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