

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Appellate Case No. 2017-001367

Elizabeth Hope Rainey, as the  
Appointed Guardian ad Litem to  
Owen C., a minor .....Appellant,

v.

South Carolina Department of  
Social Services.....Respondent.

\_\_\_\_\_  
**Designation of Matter  
to be included in the Record on Appeal**  
\_\_\_\_\_


**RECEIVED**  
SEP 13 2017  
SC Court of Appeals

Appellant proposes the following be included in the Record on Appeal:

1. Order granting summary judgment in favor of DSS;
2. Form 4 Order denying Appellant's Motion to Alter or Amend and for Reconsideration;
3. Complaint;
4. Answer;
5. DSS's Motion and Memorandum in Support of Summary Judgment with exhibits;
6. Appellant's Memorandum in Opposition to Summary Judgment with exhibits;
7. Appellant's Motion to Alter or Amend and for Reconsideration;
8. March 13, 2017 Hearing Transcript;
9. May 18, 2017 Hearing Transcript

*Signature page to follow*

Respectfully submitted,

A handwritten signature in black ink, reading "Whitney B. Harrison". The signature is written in a cursive style with a horizontal line underneath it.

**McGowan, Hood & Felder, LLC**

September 13, 2017  
Columbia, SC

Whitney B. Harrison  
1517 Hampton Street  
Columbia, South Carolina 29201  
(803) 779-0100  
[wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)

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**PROOF OF SERVICE**

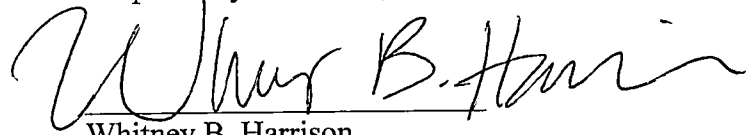
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The undersigned hereby certifies that on September 13, 2017 she served counsel for Respondent with the *Initial Brief of Appellant and Designation of Matter for the Record on Appeal* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Patrick J. Frawley  
Davis Frawley Law Firm  
Post Office Box 489  
Lexington, SC 29071

*Signature Page to Follow*

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Whitney B. Harrison". The signature is written in a cursive style with a large, looping initial "W".

Whitney B. Harrison  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201

# McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC) S.  
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Whitney B. Harrison  
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writers email: [wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)  
September 13, 2017

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: *Elizabeth Hope Rainey, v. South Carolina Department of Social Services*  
Appellate Case No. 2017-001367

Dear Ms. Kitchings,

Please find enclosed for filing the original and one (1) copy of the *Initial Brief of Appellant* and *Designation of Matter to be included in the Record on Appeal* in regards to this case. I have also enclosed a proof of service. Please return the additional filed copy to me.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

With kind regards, I am

Whitney B. Harrison

Enclosures

cc: Patrick Frawley, Esquire

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SC Court of Appeals