

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Hon. S. Jackson Kimball, III
Special Circuit Court Judge
York County Master in Equity

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SC Court of Appeals

Trial Court Case No. 2017-CP-46-00867
Appellant Case No. 2017-002024

Michael Frank, individually, and as the parent of a minor.....Appellant

vs.

South Carolina Department of Social Services.....Respondents

APPELLANT'S DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL
SCACR 209 (C)

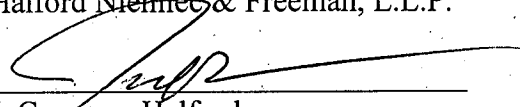
Appellant hereby designates the following to be included in the Record on Appeal and here certifies pursuant to SCACR 209(C) that the following contains no matter which is irrelevant to the Appellate review in this case.

1. March 23, 2017 Summons and Complaint
2. May 5, 2017 Motion to Dismiss under Rule 12(b)(6) SCRCPP by DSS
3. May 15, 2017 Record Transcript of Oral Argument
4. June 22, 2017 Order of Dismissal
5. July 3, 2017 Plaintiff Rule 59(e) Motion to Reconsider, Alter or Amend
6. August 24, 2017 Record Transcript of Oral Argument

7. August 29, 2017 Order Denying Plaintiff Motion for Reconsideration

Respectfully submitted January 3, 2018.

Halford Niemiec & Freeman, L.L.P.



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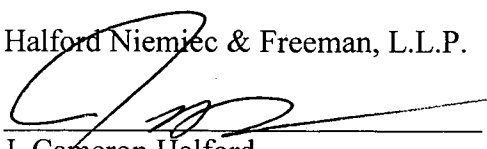
South Carolina Department of Social Services.....Respondents

PROOF OF SERVICE

I Certify that I have served Appellant's Initial Brief and Appellant Designation of Matter To Be Included in Appeal and SCACR 209(c) Certification on counsel identified below by depositing a copy of the same in the United States mail, postage prepaid, and addressed as follows, on the 3rd day of January, 2018:

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Hamilton Martens Law Firm
Post Office Box 10940
Rock Hill, South Carolina 29731
ATTORNEY FOR RESPONDENT

Halford Niemiec & Freeman, L.L.P.



J. Cameron Halford
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Matthew R. Niemiec, LLC
P. John Freeman, LLC

January 3, 2018

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Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

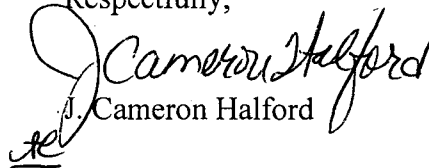
Re: Michael Frank, individually and as the parent of a minor vs.
South Carolina Department of Social Services
Case No. 2017-CP-46-00867
Appellate Case No.: 2017-002024

Dear Ms. Kitchings:

Enclosed please find for filing the Initial Brief of the Appellant and Appellant's Designation of Matter To Be Included in the Record on Appeal, and Appellant Counsel SCACR 209(C) Certification along with our certificate of service to opposing counsel. Please file the original and return a clocked copy to our offices in the envelope provided. If you have any questions regarding the enclosed or this matter, please feel free to contact my office.

With kind regards, I remain

Respectfully,


J. Cameron Halford

JCH:tml

Enclosures

cc: Mr. Michael Frank
w/enclosures
W. Keith Martens, Esquire
w/enclosures

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S.C. Court of Appeals
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