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THE SOUTH CAROLINA COURT OF APPEALS

SC Court of Appeals

CASE NO. 2020-000058

Lower Court Case No. 2020-000058

Angel Phillips

Appellant,

VS.

Hartsville Department of Social Services

Appellee,

On Appeal from Common Pleas Court

Of South Carolina Darlington County

APPELLANT'S INITIAL BRIEF

ANGEL PHILLIPS

Appellant

Email: phillipsangel82@gmail.com

(349)369-7997

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INTRODUCTION

- 1. Appellant complaint file with OIG falls under law section 15-78-80.**
- 2. OIG has Jurisdiction over the Department of Social Services.**
- 3. Appellant asking Appeals Court to overturn Common Pleas Court unlawful dismissal.**

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SUMMARY OF ARGUMENT

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Defendant is a governmental agency of the State of South Carolina. The South Carolina Tort Claims Act governs all tort claims against governmental agencies and is the exclusive civil remedy available in an action against a governmental agency. Defendant is only liable for torts within the limitations of the Tort Claims Any Action brought pursuant to the Tory Claims. Act is subject to the two-year statute of limitations. which begins to run on the date the loss was or should have been discovered, unless the claimant has first filed a verified claim which extends the statute of limitations to three years. The discovery rule is applicable to actions brought under the Tort Claims According to the discovery rule, the statute of limitations begins to run when a cause of action reasonably ought to have been discovered. The statute runs from the date of the injured party either knows or should have known by the exercise of reasonable diligence that a cause of action arises from wrongful conduct. Plaintiff had no knowledge of the

actions behind this case due to suffering from Post-Traumatic Stress Disorder and needed treatment. During this time, her 4th Amendment right was broken no paperwork was ever received. just a phone call to pick up her son. The 4th Amendment right states that Parents and children hold reciprocal rights in each other. No person No Government agency can impose itself into person life and the life of one's family without complying with specific procedures designed to protect one's rights in their own property. The United States Constitution guarantee against unreasonable searches and seizes invasions of privacy. So called merits hearing must be scheduled within thirty-five days after the case is filled to determine whether removal of the child is necessary before the court can order that a child be removed from their home. A finding that the allegations are supported by preponderance of evidence that the child is abused or neglected.

Defense Attorney Joseph Mclean motion to dismiss states that the discovery rule applicable To actions brought under the tort claims act.

Barr v. City of Rock Hill 330 S.C. 640,500S.E2d157(ct.App.1998)

This law is about real estate not tort claims act or civil and family law.

Defense Attorney used this law in the motion to dismiss.

CONCLUSION

The Appellant file complaint with The Offices of Inspector General on Date
11/27/2017

Wrongdoing that leads to breaking Civil Rights

Complaint filed with the OIG meet the requirements of a verified claim under
South Carolina own laws also rules.

Respectfully submitted,

Angel Phillips

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(346)349-7997

By: _____

Angel D. Phillips

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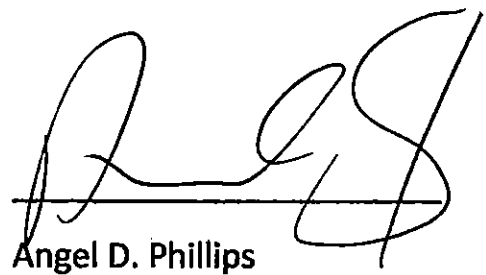
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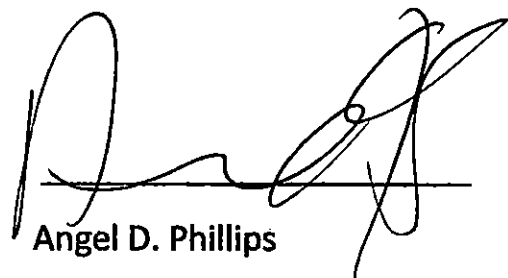
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