

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Aug 23 2021

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

SC Court of Appeals

Maité Murphy, Circuit Court Judge

Appellate Case No.: 2020-001352

Kaci May and Kaci May as guardian ad litem for A.R.M., J.H.M., J.T.M., C.B.M.,
J.R.M., and J.W. M.,Appellants

v.

Dorchester School District Two,
South Carolina Department of Social Services,
Michael Leach, and Jasmine Flemister Respondents.

**CONSENT MOTION OF RESPONDENTS DSS, ET AL. TO FILE
CORRECTED DESIGNATION OF MATTER
AND
FOR LEAVE TO FILE A SUPPLEMENTAL VOLUME TO THE RECORD
ON APPEAL**

Respondents DSS, et al., submit this consent motion for leave to file the attached Amended Designation of Matter to be included in the Record on Appeal, and to permit the filing of a short supplemental Record on Appeal.

The purpose of the amendment is to add one document that was imprecisely

identified in these Respondents' original Designation of Matter as "Motion for restraining order in Family Court case." In fact, there were two motions that meet that description, one dated September 27, 2017, and the other dated October 16, 2017. Only the latter one is currently in the Record on Appeal as filed (pp. 778-779). These Respondents propose to add the September 27, 2017 document in a Supplemental Record on Appeal.

Accordingly, these Respondents, with the consent of opposing counsel and counsel for the other Respondent (Dorchester School District 2), respectfully request that the Court permit the filing of the attached Amended Designation of Matter to be included in the Record on Appeal, and to permit the filing of a short supplemental Record on Appeal. These Respondents also request that the current August 24, 2021 date for the filing of the remaining Final Briefs be extended accordingly.

Respectfully submitted,

DAVIDSON, WREN & DEMASTERS, P.A.

By: *s/ Kenneth P. Woodington*

Kenneth P. Woodington, Esq,

kwoodington@dml-law.com

William H. Davidson, Esq.

wdavidson@dml-law.com

1611 Devonshire Drive

P.O. Box 8568

Columbia, SC 29202

(803) 806-8222

Attorneys for SCDSS, Michael Leach and Jasmine
Flemister

August 23, 2021

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Aug 23 2021

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maité Murphy, Circuit Court Judge

Appellate Case No.: 2020-001352

Kaci May and Kaci May as guardian ad litem for A.R.M., J.H.M., J.T.M., C.B.M.,
J.R.M., and J.W. M.,Appellants

v.

Dorchester School District Two,
South Carolina Department of Social Services,
Michael Leach, and Jasmine Flemister Respondents.

**AMENDED DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL (RESPONDENTS DSS, ET AL.)**

Respondents DSS, et al., propose the following to be included in the Record on Appeal, in addition to each document designated by any other party (amendments to these Defendants' original Designation are shown in **bold** in Paragraphs 5 and 6):

1. DSS Supplemental Memo in Support of Motion to Dismiss, filed August 16, 2019.
2. Order filed May 6, 2017, in No. 3:17-0416, *M.M., et al. v. Mitchum, et*

al.

3. Pretrial brief of DSS, et al., filed August 11, 2020.
4. Answer and Counterclaim in Family Court case (attached to DSS Motion to Dismiss dated 1/8/18).
5. Motion **dated October 16, 2017** for restraining order **and other relief, filed by Kaci and Warren May** in Family Court case.
6. **Motion dated September 27, 2017 for an order restraining SCDSS from interrogating the children at school and other relief, filed by Kaci and Warren May in Family Court case.**

DAVIDSON, WREN & DEMASTERS, P.A.

By: *s/ Kenneth P. Woodington*

Kenneth P. Woodington, Esq,
kwoodington@dml-law.com
William H. Davidson, Esq.
wdavidson@dml-law.com
1611 Devonshire Drive
P.O. Box 8568
Columbia, SC 29202
(803) 806-8222

Attorneys for SCDSS, Michael Leach and Jasmine
Flemister

Columbia, South Carolina

August 23, 2021

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maité Murphy, Circuit Court Judge

Appellate Case No.: 2020-001352

Kaci May and Kaci May as guardian ad litem for A.R.M., J.H.M., J.T.M., C.B.M.,
J.R.M., and J.W. M.,Appellants

v.

Dorchester School District Two,
South Carolina Department of Social Services,
Michael Leach, and Jasmine Flemister Respondents.

PROOF OF SERVICE

I hereby certify that I have served the following document by emailing it to
counsel for other parties at the email addresses below this 23rd day of August, 2021.

A copy of the email is attached.

Documents Served:

- a. Consent Motion Of Respondents DSS, et al. To File Corrected Designation
Of Matter And For Leave To File A Supplemental Volume To The Record On

Appeal, with attachment.

Counsel Served:

Robert J. Butcher, Esq.

rbutcher@camdensc-law.com

Deborah J. Butcher, Esq.

debutcher@camdensc-law.com

FOSTER CARE ABUSE LAW FIRM, P.A.

507 Walnut Street

Camden, SC 29020

HALLIGAN MAHONEY WILLIAMS SMITH FAWLEY & REAGLE, PA

Thomas K. Barlow, S.C. Bar No. 8995

tbarlow@hmwlegal.com

Susan M. Fittipaldi, S.C. Bar No. 14225

sfittipald@hmwlegal.com

1301 Gervais Street, Suite 1400

P.O. Box 11367

Columbia, SC 29211

(803) 254-4035

Attorneys for Respondent

Dorchester School District Two

AUGUST 23, 2021

s/ Kenneth P. Woodington

Kenneth P. Woodington, Esq,

kwoodington@dml-law.com

DAVIDSON, WREN & DEMASTERS, P.A.

1611 Devonshire Drive

P.O. Box 8568

Columbia, SC 29202

(803) 806-8222

From: [Kenneth Woodington](#)
To: [Susan M. Fittipaldi](#)
Cc: rbutcher@camdensc-law.com; dbutcher@camdensc-law.com; [Thomas K. Barlow](#)
Subject: Case No. 2020-001352 - Kaci May v. Dorchester School District Two
Date: Monday, August 23, 2021 11:47:00 AM
Attachments: [Motion of DSS to file Corrected DOM, etc. \(01261612xBE0C9\).pdf](#)

Please see attached Consent Motion, with attachment and proof of service.

Ken

Kenneth P. Woodington
Davidson, Wren & DeMasters, P.A.
1611 Devonshire Drive, 2nd Floor
Post Office Box 8568
Columbia, South Carolina 29202-8568
kwoodington@dml-law.com
T: 803-806-8222
F: 803-806-8855

RECEIVED
Aug 23 2021
SC Court of Appeals