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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Maite Murphy, Circuit Court Judge

Circuit Court Case Number 2017-CP-18-02001

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,

SUPPLEMENTAL RECORD ON APPEAL

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Camden, South Carolina 29021
Attorneys for the Appellants

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Attorney for Respondent South Carolina
Department of Social Services, Michael Leach, and
Jasmine Flemister

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SUPPLEMENTAL RECORD ON APPEAL

Motion filed September 27, 2017 in Family Court by Kaci and Warren May.	001
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STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

South Carolina Department of Social
Services,

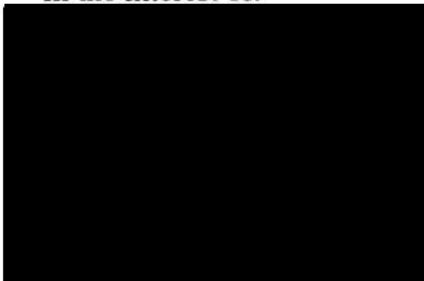
Plaintiff,

v.

Kaci May and Warren May,

Defendants,

In the interest of:



Minors under the age of 18.

IN THE FAMILY COURT OF THE
NINTH JUDICIAL CIRCUIT

Case No.: 2017-DR-18-01334

**NOTICE OF MOTION AND
MOTIONS**

TO: PLAINTIFF SCDSS AND ITS COUNSEL, DEANNE M. GRAY:

NOTICE

YOU WILL PLEASE TAKE NOTICE that on October 12, 2017 at 1:30 p.m. at the
Dorchester County Family Court, 212 Deming Way, Summerville, South Carolina, Defendants
request the following relief.

MOTION

Plaintiff seeks an Order of the Court granting the following relief:

- A. An order unsealing all SCDSS files and the adoption records of J. [REDACTED] M. [REDACTED]
[REDACTED] M. [REDACTED], and L. [REDACTED] M. [REDACTED] pursuant to S.C. Code Ann. § 63-9-780 for use in this
litigation;

- B. An order striking Plaintiff SCDSS's Court Information Sheet, filed September 14, 2017, as it is an ex parte communication with the court, it contains unverified allegations and inadmissible evidence;
- C. An order forbidding SCDSS from filing Court Information Sheet's in the future because the documents are ex parte communications and they contain unverified allegations and inadmissible evidence;
- D. Motion to stay the trial of this matter until Defendant Warren May returns from his deployment to Afghanistan in May 2018;
- D. An order restraining SCDSS from interrogating Defendants' children at school;
- E. Granting such other and further relief as this Court deems just and proper.

THE FOSTER CARE ABUSE LAW FIRM, PA

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Robert J. Butcher
S.C. Bar Numbers 74029
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Manning, South Carolina 29102
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Facsimile: 803.432.7466
dbutcher@camdensc-law.com
rbutcher@camdensc-law.com

September 27, 2017
Manning, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

South Carolina Department of Social
Department,

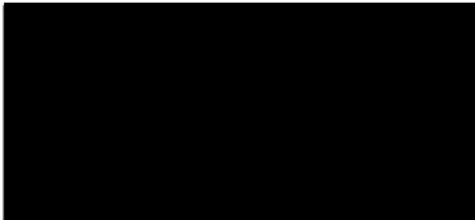
Plaintiff,

v.

Kaci and Warren May

Defendants.

In the Interest of:



Minors under the age of eighteen (18) years of
age.

IN THE FAMILY COURT OF THE
FIRST JUDICIAL CIRCUIT

Case No.: 2017-DR-18-01334

CERTIFICATE OF SERVICE

The undersigned does hereby certify that she is paralegal to the attorney for the Plaintiff in the above stated case; that she has this 5TH day of October 2017 served the following:

- 1-Motion and Order Information Form Coversheet**
- 2-Notice of Motion and Motions**
- 3-Certificate of Service**

The same was emailed to Mary Lee Briggs at marylee@briggsandinglese.com and mailed to Deanne Gray by depositing same in an authorized United States mailbox; that the envelope containing said document was property addressed, securely wrapped and sealed, and bore the proper postage; and the said envelope was addressed to the following:

Deanne M. Gray
216 Orangeburg Rd
Summerville SC 29483

Mary Lee Briggs
marylee@briggsandinglese.com



Tiffany Parnell
Paralegal
Post Office Box 486
Manning, South Carolina 29102

Deborah J. Butcher
dbutcher@camdensc-law.com

Robert J. Butcher
rbutcher@camdensc-law.com



Post Office Box 486
Manning, South Carolina,
29102

Phone: (803) 432-7599
Fax: (803) 432-7466

October 5, 2017

Deanne M. Gray
SCDSS
216 Orangeburg Rd
Summerville, South Carolina 29483

RE: SCDSS v. May (2017-DR-18-01334)

Dear Ms. Gray

Enclosed please find an unfiled copy of the following:

- 1-Motion and Order Information Form Coversheet
- 2-Notice of Motion and Motions
- 3-Certificate of Service

Should you have any questions or concerns, do not hesitate to contact us directly at 803-432-7599.

Sincerely yours,


Tiffany Parnell
Paralegal

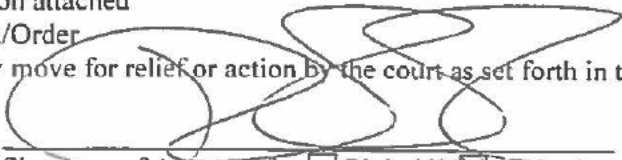
Encl.

STATE OF SOUTH CAROLINA)
)
 COUNTY OF DORCHESTER)
)
)
South Carolina Department of Social Services,)
 Plaintiff,)
 vs.)
)
Kaci May and Warren May,)
 Defendant.)

IN THE FAMILY COURT
NINTH JUDICIAL CIRCUIT

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

Docket No. 2017-DR-18-01334

Plaintiff's Attorney: <u>Deborah J. Butcher, Bar No. 74029</u> Address: <u>221 Glenwood Drive, Manning, SC 29102</u> Phone: <u>(803) 432-7599</u> Fax <u>(803) 432-7466</u> E-mail: <u>dbutcher@camdensc-law.com</u> Other: _____	Defendant's Attorney: <u>Deanne M. Gray, Bar No. _____</u> Address: <u>216 Orangeburg Road, Summerville, 29483</u> Phone: <u>(843) 486-1863</u> Fax _____ E-mail: _____ Other: _____
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information	
Nature of Motion: <u>Motion for Various Forms of Relief</u> Estimated Time Needed: <u>15 minutes</u> Court Reporter Needed: <input checked="" type="checkbox"/> YES / <input type="checkbox"/> NO	
SECTION II: Motion/Order Type	
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for <input type="checkbox"/> Plaintiff / <input checked="" type="checkbox"/> Defendant	<u>September 27, 2017</u> Date submitted
SECTION III: Motion Fee	
<input type="checkbox"/> PAID - AMOUNT: \$ _____ <input checked="" type="checkbox"/> EXEMPT: (check reason)	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input checked="" type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCP) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____	
JUDGE'S SECTION <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____ Judge Signature: _____
CLERK'S VERIFICATION	
Collected by: _____ Date Filed: _____ <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____	

Custodial Parent (if applicable): _____

The undersigned hereby certifies that the Supplemental Record on Appeal contains all material proposed to be included by any of the parties and not any other material.

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Nov 01 2021

SC Court of Appeals

Respectfully submitted,

FOSTER CARE ABUSE LAW FIRM, PA

s/Robert J. Butcher

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Camden, South Carolina
November 1, 2021