STATE OF SOUTH CAROLINA) IN THE FAMILY COURT) FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF HORRY)
Salma Judith Dominguez Ruiz,	
Plaintiff,)
VS.	ORDER FOR PUBLICATION
Orlando Eriberto Orozco Ardeano, Defendant.) Docket No.: 2018-DR-26-1458
UPON reading the Application f	or Order for Service by Publication of Brana J.
Williams, Esq. on behalf of the Plaint	iff, it is hereby ORDERED that the Defendant
Orlando Eriberto Orozco Ardeano be s	served by publication through GLOBAL LEGAL
NOTICE, LLC (www.GlobalLegalNotice	s.com) which is more likely to give actual notice
to the Defendant, and that the said put	olication be published once a week for three (3)
consecutive weeks.	
IT IS SO ORDERED this	l day of August, 2018, in Conway, South
Carolina.	Family Court Judge/ Fifteenth Judicial/Circuit

STATE OF SOUTH CAROLINA COUNTY OF HORRY) IN THE FAMILY COURT OF THE) FIFTEENTH JUDICIAL CIRCUIT
Salma Judith Dominguez Ruiz)
Plaintiff	SUMMONS AND
vs.	NOTICE OF HEARING
Orlando Eriberto Orozco Ardeano))
Defendant)) DOCKET NO.: 2018-DR-26-1458

TO: ORLANDO ERIBERTO OROZCO ARDEANO:

YOU ARE HEREBY SUMMONED and required to respond to the Complaint in this action, a copy of which is hereby served upon you and to serve a copy of your response on the subscriber at her address, Brana J. Williams, Indigo Family Law, LLC, 1500 Highway 17N Suite 102, Surfside Beach, South Carolina, 29575, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Motion and the Complaint.

This action was filed on June 15, 2018.

This shall also serve as a Notice of Hearing, which is scheduled for September 10, 2018 at 9:30 a.m. before the Honorable Ronald Norton, in Family Courtroom 2D at the Horry County Judicial Complex located at 1301 2nd Avenue, Conway, South Carolina.

BE SO NOTIFIED.

BRANA J. WILLIAMS, ESQ. Attorney for Plaintiff

INDIGO FAMILY LAW, LLC 1500 Highway 17N Suite 102 Surfside Beach, South Carolina 29575

Telephone: (843)238-5100 Facsimile: (843)238-5102 ESTADO DE CAROLINA DEL SUR) EN EL TRIBUNAL DE FAMILIA DE LA CONDADO DE HORRY

))) DÉCIMOQUINTO CIRCUITO JUDICIAL

Salma Judith Dominguez Ruiz

))))))

La Demandante

CITACIÓN Y NOTIFICACIÓN DE AUDIENCIA

VS.

Orlando Eriberto Orozco Ardeano

El Demandado

EXPEDIENTE NO.: 2018-DR-26-1458

ORLANDO ERIBERTO OROZCO ENVIADO A: ARDEANO:

POR LA PRESENTE SE LE CITA y se le requiere que responda a la Demanda que es el objeto de la presente acción, una copia de la cual se le entrega por la presente, y que usted entregue una copia de su respuesta a la suscrita a su dirección: Brana J. Williams, Indigo Family Law, LLC, 1500 Highway 17N Suite 102, Surfside Beach, South Carolina, 29575, United States, dentro de trenta (30) días depués de la entrega de la presente, sin contar el día de tal entrega, y si usted no respondere a la Demanda dentro del período susodicho, la Demandante de la presente acción solicitará que la Tribunal conceda el desagravio exigido en la Petición y la Demanda.

La acción fue presentada el 15 de junio del año 2018.

La presente servirá también como Notificación de Audiencia, la cual está programada para el 10 de septiembre del año 2018 a las 9:30 de la mañana ante el ilustrísimo señor Ronald Norton, en la sala del Tribunal de Familia 2D en el Centro Judicial del Condado de Horry, ubicado a 1301 2nd Avenue, Conway, Carolina de Sur, Estados Unidos.

QUE ASÍ SE NOTIFIQUE.

BRANA J. WILLIAMS, ESQ. Abogada de la Demandante

rana I Williami

(G(O)P

INDIGO FAMILY LAW, LLC 1500 Highway 17N Suite 102 Surfside Beach, South Carolina 29575

UNITED STATES

Telefono: +1 (843) 238-5100 Facsímil: +1 (843) 238-5102

Translated by English to Spanish by Clayton Causey (ATA

Membership Number: 236139)

P. Clayton D. Causey, CT, ATA Certified Translator

P. Clayton D. Causey, CT

ATA-Certified Translator
2000A Highway 15
Myrtle Beach, South Carolina, USA, 29577

⊠ p.clayton.d.causey@gmail.com

To whom it may concern,

The following page is a translation of legal documents regarding *Salma Judith Dominguez Ruiz* from Horry County. This translation was performed from the American English language into the Mexican Spanish language by me, P. Clayton D. Causey, Certified Translator member of the ATA (American Translators Association, Member #236139, Tel. (703) 683-6100), the most widely respected governing body for translators in the United States of America. I hereby certify that the translation I have made is complete and faithful to the original documents provided to me. Should you have any questions about the details of the following translation, please do not hesitate to contact me (information above).

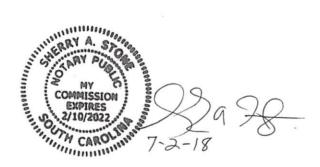
Regards,

P. Clayton D. Causey CT

July 2nd, 2018

Date

2018 JUL 10 AM 8: 18
CLERK OF COUNTY, SC



NOTICE OF HEARING

A HEARING HAS BEEN SET IN THIS MATTER FOR THE 10th DAY OF September 2018, AT 9:30 A.M., BEFORE THE HONORABLE Ronald Norton IN FAMILY COURTROOM 2D.

	Krystle Church,
	Family Court Coordinator,
	Fifteenth Judicial Circuit
************	************
HE	ARING REQUEST

CAPTION: Salma Judith Doming	uez Ruiz <u>vs.</u> Orlando Eriberto Orozco Ardeano
040540 0015	DATE MOTION FILED: June 15, 2018
MOVING ATTORNEY(S): Brana J	. Williams, Esq.
TEL: 843-238-5100 FAX: 842 220	F400

TEL: 843-238-5100 FAX: 843-238-5102

MOVING ATTORNEY REPRESENTS: [X] PLAINTIFF [] DEFENDANT [] GAL

OPPOSING ATTORNEY(S):

NATURE OF MOTION: Temporary Relief

ESTIMATED TIME NEEDED: 15 minutes

DATES UNAVAILABLE: September 11 and 12

I certify I have consulted with opposing counsel regarding the above "Dates Unavailable":

STATE OF SOUTH CAROLINA)	IN THE FAMILY COURT FIFTEENTH JUDICIAL CIRCUIT			
COUNTY OF HORRY	TH TEENTH JUDICIAL CIRCUIT			
Salma Judith Dominguez Ruiz, Plaintiff, vs. Orlando Eriberto Orozco Ardeano.	MOTION AND ORDER INFORMATION FORM AND COVERSHEET			
Defendant.	Docket No. 2018-DR-26 1458			
Plaintiffs' Attorney: Brana J. Williams, Esq., Bar No. 64193 Address: 1500 Hwy 17N, Ste. 102, Surfside Beach, SC Phone: (843)238-5100Fax (843)238-5102 E-mail: brana@indigofamilylaw.com Other:	Defendant's Attorney:, Bar No Address: Phone: Fax			
MOTION HEARING REQUESTED (attach wri ☐FORM MOTION, NO HEARING REQUESTED ☐PROPOSED ORDER/CONSENT ORDER (com	tten motion and complete SECTIONS I and III) (complete SECTIONS II and III)			
Nature of Motion: Temporary Relief and Special Findings Estimated Time Needed: 15 minutes Court Reporter Needed: VFS/ NO				
Form Motion/Order	Iotion/Order Type			
I hereby move for relief or action by the court as set forth in the attached proposed order. Bland J Wlliam Signature of Attorney for Plaintiffs / Defendant Date submitted				
SECTIO	Defendant Date submitted N III: Motion Fee			
EXEMPT: Rule to Show Cause in Child or Spousal Support (check reason) Domestic Abuse or Abuse and Neglect Indigent Status State Agency v. Indigent Party Sexually Violent Predator Act Post-Conviction Relief Motion for Stay in Bankruptcy Motion for Publication Motion for Execution (Rule 69, SCRCP) 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: Other:				
JUDGE'S SECTION Motion Fee to be paid upon filing of the attached order. Other:	JUDGE CODE Date:			
	Judge Signature: CRIFICATION			
Collected by: Date Filed: MOTION FEE COLLECTED: \$ 35.00 CONTESTED – AMOUNT DUE: \$	PAFF			

Custodial Parent (if applicable): _____

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
COUNTY OF HORRY) FIFTEENTH JUDICIAL CIRCUIT
Salma Judith Dominguez Ruiz,)
Plaintiff,) NOTICE OF MOTION AND
VS.) MOTION FOR TEMPORARY RELIEF
Orlando Eriberto Orozco Ardeano,	() See 5 (F
Defendant.) Docket No.: 2018-DR-26-
	Y.S.
TO: DEFENDANT, ORLANDO ERIBERTO O)DOZOO ADDE

TO: DEFENDANT, ORLANDO ERIBERTO OROZCO ARDEANO:

YOU WILL PLEASE TAKE NOTICE that the Plaintiff, by and through her undersigned counsel of record, will move before the Presiding Judge of the Family Court at the Horry County Government and Justice Center in Conway, South Carolina, on the Fifth day hereafter, or as soon as this matter may be heard, requesting certain pendente lite relief; and, at that time, you should appear before the Presiding Judge for the purpose of presenting evidence, if you have any, relative to the following issues:

- 1. Granting Plaintiff full custody the child;
- 2. The appointment of a Guardian Ad Litem, for the best interest of the child;
- 3. Granting the restraining orders outlined in Plaintiff's Complaint;
- 4. Requiring the Defendant to pay the Plaintiff's attorney's fees and costs in the event she contests any of the issues addressed herein; and,
- 5. For such other and further relief as this Court deems just and proper.

Dominguez Ruiz vs. Orozco Ardeano Motion for Temporary Relief 2018-DR-26-_

Respectfully submitted,
Brand J Williams

Brana J. Williams, Esq. Lucas M. Oates, Esq. Attorneys for Plaintiff

INDIGO FAMILY LAW, LLC 1500 Highway 17N Suite 102 Surfside Beach, SC 29575 (843)238-5100 Fax: (843)238-5102

This the <u>/3th</u> day of June, 2018 in Surfside Beach, South Carolina.

Dominguez Ruiz vs. Orozco Ardeano Motion for Temporary Relief 2018-DR-26-___

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
COUNTY OF HORRY) FIFTEENTH JUDICIAL CIRCUIT
Salma Judith Dominguez Ruiz,)
Plaintiff,))
VS.) MOTION FOR SPECIAL FINDINGS) AND RULINGS OF LAW
	(Custody)
Orlando Eriberto Orozco Ardeano,) POOLET US
Defendant.) DOCKET NO.: 2018-DR-26-
The Plaintiff Salma Judith Danie	AHIO OLIVINA O

The Plaintiff, Salma Judith Dominguez Ruiz, petitioning the court for solle custody of her daughter, BMDR, in these proceedings, hereby moves that the Court conclude special findings of fact and rulings of law for the following reasons:

- BMDR intends to petition the United States Citizenship and Immigration Services (U.S.C.I.S) to avail herself of certain federal legislation affording special immigrant status for juveniles. See 8 U.S.C. § 1101(a)(27)(J0; 8C.F.R. §204.11(a).
- 2. Prerequisite to applying to the U.S.C.I.S., there must be findings entered by a state court having jurisdiction to make determinations regarding the custody of juveniles. The required findings from the Horry County Family Court necessary to avail the child of the federal legislation are as follows:
 - The minor child is declared dependent upon the state court for her care and protection and her custody continues under the jurisdiction of State Courts;
 - Reunification of the minor child with one or both of the immigrant's parents is not viable due to abuse, neglect, abandonment or a similar basis found under State law;
 - It is not in the best interest of the minor child to be returned to her country of origin, Guatemala;

d. It is in the best interests of the minor child to remain in the custody of her mother, who is granted sole custody by this honorable Court.

WHEREFORE, the Plaintiff asks this Court to enter the above findings regarding BMDR.

Respectfully submitted,

Brana J. Williams, Esq. Lucas M. Oates, Esq. Attorneys for Plaintiff

INDIGO FAMILY LAW, LLC 1500 Highway 17N Suite 102 Surfside Beach, South Carolina 29575

Telephone: (843)238-5100 Facsimile: (843)238-5102

This the /3 th day of June, 2018 In Surfside Beach, South Carolina.

STATE OF SOU	TH CAROLINA)	IN T	HE FAMILY COL	IDT	
COUNTY OF HO	ORRY)) IN THE FAMILY COURT) FIFTEENTH JUDICIAL CIRCUIT)			
Salma Judith Don	ninguez Ruiz)				
	Plai	intiff,)	FAMIL	Y COURT COVE	DCHEET	
	VS.)		1 COURT COVE	KSHEET	
Orlando Eriberto)				
	Defen	dant.) Doo	cket No. 2018	-DR-26 1458	/	
and mied out comple	eet and information contained he ired by law. This form is require tely. A copy of this coversheet m	rein neither repl ed for docketing oust be served on	aces nor supplen	nents the filing and ser	rvice of place	lings or I and dated, mplaint.
Submitted by: Address:	Brana J. Williams, Esquire	S	C Bar#	64193	TT C	810
Address:	1500 Hwy 17N, Ste. 102	Т	elephone#	(843)238-5100	25	
Email:	Surfside Beach, SC 2957	'5 F	ax#	(843)238-5102	227	- K
Zman.	brana@indigofamilylaw.	com O	ther:		89	5
DOCKETING INF ☐ This case is subje ☐ This case is exem	CORMATION (Check one box ect to MEDIATION pursuant to apt from ADR (certificate attach	below if filing the Family Cou led).	in a Mandator art Alternative D	ry Mediation County Dispute Resolution Ru	UNITY SC	JUN 15 AM ID: 13
		Nature of Actio	n Codes			
Divorce (110)	Marital Dissolution	(Check O	ne)			
Registration of Registration of	0) ort and Maintenance (130) Foreign Divorce Decree – without supprofition – Other (199) Abuse and Neglect lect – Child (210) lect – Adult (220) lect – Other (299)	oort/custody (190) /custody (191)	Registration of UIFSA – Out	rt - Administrative Process t - Judicial Process (503) of Foreign Order of Suppor- going (505) oming (506) of Alimony (525) nses (530)		
☐ Truancy (311) ☐ Incorrigible (31 ☐ Runaway (313 ☐ Criminal Offens	Juvenile Delinquency 2)		Registration of	of Custody/Visitation (615 ustody – Nonparent (616) of Foreign Child Custody C ation – Other (699)		
Criminal Offens Criminal Offens Criminal Offens Juvenile Delinqu Domestic Abuse Domestic Abuse	se – Property (317) se – Public Order (318) se – Other (320) uency – Other (399) Protection from Domestic Abuse		i cillimation o	rth Record (720) sss (730)	(771)	
☐This case is exemp	ot from ADR (certificate attache Signature:	ed).] [
Custodial Parent (if		0 0000		_ Date: (0-/3-	- UP &	
Note: Frivolous civil pr	roceedings are subject to sanctions	Diregiont to D. 1	II gene-			
Sanctions Act, S.C. Cod	roceedings are subject to sanctions le Ann. § 15-36-10 et seq.	pursuant to Kule	TI, SCRCP and	the South Carolina Fri	volous Civil 1	Proceedings
SCCA 467 (12/20	15)	F /A	H HD			acce must be

Written request for final hearing in this case must be delivered by the party or his/her attorney to the Clerk of Court's office within 365 days of this filing date. Failure to comply with this rule shall result in the dismissal of this case by the Court.

Date

Effective January 1, 2016, family court actions in all counties are subject to mediation. Under the provisions of the Supreme Court's Rules for Alternative Dispute Resolution (ADR), mediation is defined as [an] informal process in which a third-party mediator facilitates settlement discussions between parties. Any settlement is voluntary. In the absence of settlement, the parties lose none of their rights to trial.

Also under the ADR Rules, the parties may agree on a mediator or the Clerk of Court will appoint a mediator from the certified list. If the Clerk appoints a mediator from the list, the mediator will be certified by the Board of Arbitrator and Mediator Certification and may be either a lawyer, a licensed mental health professional or any other individual meeting the certification requirements.

Whether or not the mediator is a lawyer, if appointed by the court, the charge per hour is set at a specified amount under the provisions of ADR Rule 9. Parties are responsible for payment of the mediator as set out in ADR Rule 9.

SUPREME COURT RULES REQUIRE MEDIATION OF ALL CONTESTED DOMESTIC RELATIONS ACTIONS. IF THE DOCKETING INFORMATION ON PAGE 1 OF THIS COVERSHEET INDICATES THAT THIS CASE IS SUBJECT TO MEDIATION YOU ARE NOTIFIED THAT MEDIATED SETTLEMENT CONFERENCES ARE REQUIRED IN THIS CASE, AND THAT THE COURT-ANNEXED ADR RULES SHALL APPLY TO ALL CASES IN WHICH MEDIATION IS REQUIRED. FOR ADDITIONAL INFORMATION CONCERNING THE PROCESS AND TIME FRAMES, PLEASE CONSULT THE ADR RULES. KEY SECTIONS OF THE RULES ARE IDENTIFIED BELOW.

CONTESTED ACTIONS INVOLVING CUSTODY AND VISITATION

ALL OTHER CONTESTED ACTIONS

Rule 3 Rule 4(d)(2)(3)(4) &(5) Rule 5(g) Rule 6(g) Rule 7(f) Rule 9	Actions Subject to ADR Appointment of Mediator by Family Court Scheduling in Family Court Agreement in Family Court Reporting Results of Conference
Kule 9	Compensation of Neutral

Indigent Cases: Where a mediator has been appointed, a party may move before the Chief Judge for Administrative Purposes to be exempted from payment of neutral fees and expenses based upon indigency. Applications for indigency shall be filed no later than ten (10) days after the ADR conference has been concluded. Determination of indigency shall be in the sole discretion of the Chief Judge for Administrative Purposes.

Please Note: Attendance at mediated settlement conferences is mandatory. You must comply with the Supreme Court rules regarding court-ordered mediation. Failure to do so may affect your case and may result in sanctions.

Note: Frivolous civil proceedings are subject to sanctions pursuant to Rule 11, SCRCP and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. § 15-36-10 et seq.

SCCA 467 (12/2015)

STATE OF SOUTH CAROLINA) IN THE FAMILY CO	URT
COUNTY OF HORRY) FIFTEENTH JUDICIAL (
Salma Judith Dominguez Ruiz,)	
Pl	ntiff,)	
VS.) SUMMONS	2018
Orlando Eriberto Orozco Ardeano,	RRY CO	JUN 15
Defer	ant.) DOCKET NO.: 2018-DR-2	
TO: DEFENDANT ABOVE NAME		ID: IC

YOU ARE HEREBY SUMMONED and required to respond to the Complaint in this action, a copy of which is hereby served upon you and to serve a copy of your response on the subscriber at his address, Lucas M. Oates, INDIGO FAMILY LAW, LLC., 1500 Highway 17N Suite 102, Surfside Beach, South Carolina, 29575, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

> rana J William BRANA J. WILLIAMS, ESQ. LUCAS M. OATES ESQ. Attorney for Plaintiff

INDIGO FAMILY LAW, LLC 1500 Highway 17N Suite 102 Surfside Beach, South Carolina 29575 Telephone: (843)238-5100

Facsimile: (843)238-5102

This the /3% day of June, 2018 In Surfside Beach, South Carolina.

STATE OF SOUTH CAROLINA) IN THE FAMILY COURT
COUNTY OF HORRY) FIFTEENTH JUDICIAL CIRCUIT)
Salma Judith Dominguez Ruiz,)
Plaintifi	
VS.) COMPLAINT (Custody)
Orlando Eriberto Orozco Ardeano,))) DOCKET NO.: 2018-DR-26-
Defendant	0

TO: ORLANDO ERIBERTO OROZCO ARDEANO, DEFENDANT ABOVE NAMED:

The Plaintiff, by and through her undersigned attorney, would respectfully allege and show unto this Honorable Court the following:

Jurisdiction

- 1. The Plaintiff is a resident of the County of Horry, State of South Carolina, and have been so for more than six (6) months prior to the commencement of this action, along with the child who is the subject of this action.
 - 2. The Defendant is a citizen and resident of the country of Guatemala.
- 3. The Plaintiff and Defendant were never married but were involved in a relationship prior to the child's conception, and have two (2) children born of them, to wit: BMDR, now seventeen (17) years old, and Anjel Hernan Orosco Dominguez, now eighteen (18) years old and not part of these proceedings. No other children were born or are expected.
- 4. During 2003 to 2004 the parties resided together in the U.S., and the children were left to be cared for by family members in Guatemala. In 2004, Defendant returned to their native country of Guatemala, while the Plaintiff has been living here ever since.
- 5. In 2016, the minor child, entered United States illegally via Mexico and was apprehended by Border Patrol in Texas. She was later released to allow her to join Plaintiff

Mother in South Carolina.

6. The minor child has a pending Immigration Court matter, with next appearance

on September 12, 2018, at the Immigration Court in Charlotte, North Carolina.

7. This is an action for child custody and for incidental relief and the Plaintiff is

informed and believes that this Court has jurisdiction of the subject matter before it.

UCCJEA INFORMATION PURSUANT TO § 63-15-346, CODE OF LAWS OF SOUTH

8. Plaintiff further alleges that for the last year preceding this action, the child has

resided in Myrtle Beach, South Carolina with the Plaintiff Mother.

9. Plaintiff alleges that the parties have not participated as a party or witness in any

other proceeding concerning the custody of or visitation with the child.

Plaintiff is unaware of any proceeding that could affect the current proceeding,

including proceedings for enforcement and proceedings relating to domestic violence, protective

orders, termination of parental rights, and adoptions.

11. Plaintiff is unaware of any person not a party to the proceeding who has physical

custody of the child or claims rights of legal custody or physical custody of, or visitation with, the

child.

Custody

12. Plaintiff is the biological mother of BMDR, and the child has been living with her

for the last year after she entered the United States. Prior to her arrival, the child had lived with

the Defendant Father in the country of Guatemala, due to the fact that mother could not return

to Guatemala, because of her immigration status.

13. While the child was in Guatemala, Mother sent money to the child's paternal

grandparents to assist in the raising of the minor child and her older brother, who is now

emancipated. Upon information and belief, said remittances intended for the children were in

Dominguez Ruiz vs. Orozco Ardeano Complaint 2018-DR-26Page 2 of 5

fact intercepted and forcefully taken by the Defendant who used the money to support his

drinking habit.

By the child's own recount of events, Defendant Father was abusive, neglectful, 14.

and failed to provide any support for the minor child. In addition, Father abused alcohol and also

subjected the child to sexual molestation.

The minor child worked very hard selling vegetables on the side of the road and 15.

with assistance from Plaintiff's family in Guatemala, was able to obtain enough money to pay

someone to take her through the United States border. Her sole purpose was to join her mother

in South Carolina and to move away from her abusive father and the misery she had

experienced during her young life.

16. Based upon the foregoing, Plaintiff prays for an Order granting her the custody of

the minor child, and Plaintiff pray for this relief pendente lite and permanently.

Restraining Orders/ Discovery

The Plaintiff reiterates and incorporates her previous allegations as fully as if set 17.

forth herein verbatim.

Plaintiff requests an order of this court, pendente lite and permanently, enjoining 18.

Defendant from harassing, molesting, or interfering with her and from interposing any restraints

upon her personal liberty.

Plaintiff further alleges that the Defendant should be restrained and enjoined 19.

from coming about the residence of the Plaintiff or her place of employment, unless agreed

upon in writing, pendente lite and permanently.

Attorney's Fees

20. Plaintiff has incurred attorney's fees and costs in this matter and she is informed

and believes that the Defendant should be fully responsible therefor, as the filing of this action is

directly related to his behavior and actions negatively impacting the well-being of the minor

Dominguez Ruiz vs. Orozco Ardeano Complaint

child. She would affirmatively show that she was ultimately forced to institute this action based upon the Defendant's actions. Accordingly, she prays for this relief *pendente lite* and permanently.

Guardian ad Litem

- 21. Finally, especially given the Defendant's behavior, Plaintiff prays that a Guardian ad litem be appointed.
- 22. Plaintiff requests that the Guardian immediately begin investigations in this matter, and that he or she investigate the psychological harm the Defendant's behavior has caused on the minor child and to ensure that the child does not continue to suffer mentally or psychologically.
- 23. Further, the Plaintiff would seek this Court's Order requiring the Defendant to be responsible for all or a substantial portion of any Guardian *ad litem* fees to be incurred.

WHEREFORE, Plaintiff prays that this Honorable Court inquire into this matter and that it issue its Order awarding unto her the following relief pendente lite and permanently:

- (a) Granting the Plaintiff custody of the child, pendente lite and permanently, to serve the best interest of the child;
- (b) Making special findings that the child is dependent upon this court, the reunification with her Father is not viable due to neglect, abuse and abandonment, it is not in the child's best interest to return to Guatemala and it is in her best interest to stay in this country with her Mother;
- (c) Requiring the Defendant to cooperate with any investigation relating to the minor child;
- (d) Granting Plaintiff's attorney's fees and costs to be paid by Defendant;
- (e) Appointing a Guardian ad Litem, and requiring Defendant to pay all or a substantial portion of the fees; and,
- (f) Such other and further relief as this Honorable Court may deem just and proper.

Respectfully submitted,

Brana J. Williams, Esq. Lucas M. Oates Esq.

Attorneys for Plaintiff

INDIGO FAMILY LAW, LLC 1500 Highway 17N Suite 102

Surfside Beach, South Carolina 29575

Telephone: (843)238-5100 Facsimile: (843)238-5102

This the 13th day of June, 2018 In Surfside Beach, South Carolina.

STATE OF SOUTH CAROLINA)	IN THE FAMILY (COURT		
COUNTY OF HORRY)	FIFTEENTH JUDICIA	AL CIRCU	JIT	
Salma Judith Dominguez Ruiz,)	CONFIDENT REFERENCE LI REDACTED IDEN	ST OF		
Plaintiff, vs.)			21	
Orlando Eriberto Orozco Ardeano,)		ORK)	NOF 81	
Defendant.)	Case No. : 2018-DR-26-	K OF C	5	277
	,	0430 No 2010-DR-20-	797	T.	EO

THE INFORMATION ON THIS FORM IS CONFIDENTIAL AND MUST NOT BE-PLACED IN A PUBLICLY ACCESSIBLE PORTION OF A FILE OR CASE MANAGEMENT SYSTEM.

PLEADING OR DOCUMENT	UNREDACTED IDENTIFIER	SUBSTITUTED
Complaint	Bekerlin Marineth Dominguez Ruiz, DOB: 01/18/2001	IDENTIFIER BMDR, 17 year old daughter

CONFIDENTIAL