

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM HAMPTON COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

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Case No. 2010-CP-25-489 and 490

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Lind Johnson, as Personal Representative of the Estate of  
Inez Roberts.....Respondent,

v.

Heritage Healthcare of Estill, LLC, d/b/a Heritage of the Lowcountry  
and/or Uni-Health Post Acute Care of the Lowcountry, United Clinical  
Services, Inc., United Rehab, Inc., and UHS Pruitt Corporation .....Appellants.

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**RESPONDENT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

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In addition to the matter designated by Appellant in its initial Designations,  
Respondent proposes the following to be included in the Record on Appeal:

1. Entire Transcript of Hearing on February 11, 2011 (Plaintiff's Motion to Strike)
2. Entire Transcript of Hearing on December 3, 2008
3. Entire Deposition Transcript of Sally Dobson
4. Entire Deposition Transcript of Linda Johnson
5. Plaintiff's Temporary Restraining Order S&C, August 14, 2008
6. Order of Court, September 5, 2009
7. Defendant's Motion to Dissolve TRO

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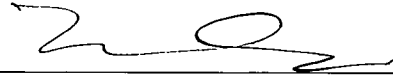
**SC Court of Appeals**

8. **Order of Judge Mullen, 12/16/2008**
9. **Appellants' First Notice of Appeal concerning Medical Records Order**
10. **Order Dismissing Appeal).**
11. **Death Certificate of Inez Roberts**
12. **Notices of Intent of Plaintiff, April 13, 2010**
13. **Statement of Impasse re Pre-Suit Mediation**
14. **HHE Answers to Interrogatories and RFP's, 1/21/11**
15. **Discovery Responses of Each Defendant, 1/21/11**
16. **Plaintiff's 1<sup>st</sup> Supp. RFP's, July 26, 2011**
17. **HHE Supp. Resp., 1/31/11**
18. **Plaintiff's Motion to Compel, 2/16/11)**
19. **Plaintiff's Motion to Compel, June 8, 2011**
20. **Defendants' Requests to Admit to Plaintiff**
21. **Appellant's Interrogatories to Plaintiff**
22. **HHE 's Admission Assessment.**
23. **HHE 's Nurse's Notes (Exhibit 2 to Plaintiff's Memorandum in Opposition to Motion to Compel Arbitration.)**
24. **Wound Care Notes (attached as Exhibit 3 to Plaintiff's Memorandum in Opposition to Motion to Compel Arbitration**
25. **Discharge Summary of Inez Roberts (Exhibit 4 to Plaintiff's Memorandum in Opposition to Motion to Compel Arbitration).**
26. **AAA Healthcare Policy Statement, January 1, 2003**
27. **Rule R-2, AAA Commercial Arbitration Rules**

**28. Rule R-3, AAA National Roster of Arbitrators.**

**29. Rule R-49, AAA**

**30. Rule 51, AAA**



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June 21, 2013  
Ridgeland, S.C.

ATTORNEYS FOR RESPONDENT

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**CERTIFICATE OF SERVICE**

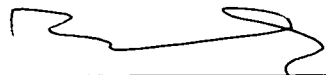
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I, Matthew V. Creech, of the law offices of Peters, Murdaugh, Parker, Eltzroth & Detrick, attorneys for the Respondents, do hereby certify that I have served all counsel in this action with a copy of the Initial Brief of Respondents and Respondent's Designation of Matter to be included in the Record on Appeal by mailing a copy of the same to counsel via United States Mail, postage prepaid, at the following address(es):

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June 21, 2013