

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Appellate Case No. 2012-213052

Pee Dee Health Care P.A. (PDHC), Tony R. Megna, Josiah S. Matthews, M.D., Alexander H. Cohen, M.D. HTR Management, LLC, MCHG, LLC [MCHG], Katie Noyes, Marks Callahan, Warren Mark Matthews, Sr., Benjamin R. Matthews, Eileen Segers, Mary C. Megna, Kim Weatherford, and Barbara Stokes, Kim Munn,
Appellants,

v.

1. Attorneys:

Nettles Turbeville and Reddick, E. Leroy Nettles, Sr., Elbert K. Turbeville, Larry G. Reddick, the McNair Law Firm, Celeste T. Jones, and

2. Current Board members of the Lower Florence Hospital District (all being sued in their individual capacities):

Scott W. Askins, James H. Clarke, W. "Scotty" P. Campbell, Floyd L. Keels, and William "Billy" Morris, all in their individual capacities, and

3. Past Board members of the Lower Florence Hospital District (both being sued in their individual capacities):

Joe Landrum, Dan Buschard, and

4. Lake City physicians:

RECEIVED

JUL 10 2013

SC Court of Appeals

David W. Moon, Albert D. Mims, Ernest M. Atkinson, Richard Ellis, Daniel DeCamps, Steven Askins, Benjamin Wade Lamb, James J. Thorny, Sabrina G. O'Brien, Kristopher Crawford, Brad Russell, Marshall W. White, and

5. Employees (or former Employees) of Lake City Community Hospital:

Mike Faucette, Carmen Polly Holt, Mary Dukes, Pete Bowman, Iris Hanna, John R. "Buddy" Watkins, and

6. Unidentified persons including but not limited to

(a) unidentified employees of Lake Community Hospital who were:

(i) stationed at the Lake City, SC hospital campus (including its medical offices) and

(ii) stationed at the Johnsonville, SC medical office, and

(b) others, whose names and identities are unknown to the Plaintiffs, who participated with the Defendants in regard to the acts and omissions complained of by the Plaintiffs as stated herein, all such Defendants whose names are unknown to the Plaintiffs and who are identified herein as multiple Jane Does and multiple John Does,

And

Lower Florence District Board d/b/a Lake City Community Hospital, Defendants,

Of Whom Nettles Turbeville and Reddick, E. Leroy Nettles, Sr., Elbert K. Turbeville, Larry G. Reddick, the McNair Law Firm, and Celeste T. Jones are the Respondents.

DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL

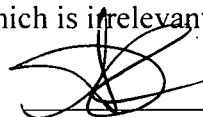
Appellants propose the following be included in the Record on Appeal:

1. Form 4 of September 4, 2012;
2. Order of August 31, 2012;

3. Form 4 of August 27, 2012;
4. Order of August 24, 2012;
5. Order of April 30, 2012;
6. Second Amended Complaint and Request to Compel Arbitration dated May 30, 2012;
7. Defendants McNair Law Firm, P.A. and Celeste T. Jones' Motion to Dismiss the Second Amended Complaint dated June 12, 2012;
8. Defendants Nettles, Turbeville & Reddick, E. Leroy Nettles, Sr.; Elbert K. Turbeville, and Larry G. Reddick's Motion to Dismiss the Second Amended Complaint, dated June 15, 2012;
9. Plaintiffs' Motion to Compel Arbitration, dated June 21, 2012;
10. Defendants' Memorandum of Law in Support of Motion to Dismiss the Second Amended Complaint and Request to Compel Arbitration dated July 10, 2012;
11. Plaintiffs' Memorandum in Opposition of Defendants' Motion to Dismiss dated July 11, 2012;
12. Transcript of Proceedings dated July 11, 2012;
13. Letter to Court from Robert E. Stepp, Esquire dated August 7, 2012;
14. Letter to Court from Aimee J. Zmroczek, Esquire dated August 9, 2012;
15. Letter to Court from Robert E. Stepp, Esquire dated August 13, 2012.

I certify that this designation contains no matter which is irrelevant to this appeal.

July 10, 2013.



Aimee J. Zmroczek, Esq.
A.J.Z. Law Firm, LLC
1330 Lady Street, Suite 400
P.O. Box 11961
Columbia, South Carolina, 29211
(803) 400-1918 (telephone)
(803) 403-8005 (fax)
ajzlawfirm@gmail.com
Attorney for Appellants

THE STATE OF SOUTH CAROLINA
In the Court of Appeals
2012-213-052

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

Case No. 2011-CP-21-00841

Pee Dee Health Care P.A. (PDHC), Tony R. Megna, Josiah S. Matthews, M.D., Alexander H. Cohen, M.D. HTR Management, LLC, MCHG, LLC [MCHG], Katie Noyes, Mark S. Callahan, Warren Mark Matthews, Sr., Benjamin R. Matthews, Eileen Segers, Mary C. Megna, Kim Weatherford, and Barbara Stokes, Kim Munn, Appellants,

v.

1. Attorneys:

Nettles Turbeville and Reddick, E. Leroy Nettles, Sr., Elbert K. Turbeville, Larry G. Reddick, the McNair Law Firm, Celeste T. Jones, and

2. Current Board members of the Lower Florence Hospital District (all being sued in their individual capacities):

Scott W. Askins, James H. Clarke, W. "Scotty" P. Campbell, Floyd L. Keels, and William "Billy" Morris, all in their individual capacities, and

3. Past Board members of the Lower Florence Hospital District (both being sued in their individual capacities):

Joe Landrum, Dan Buschard, and

4. Lake City physicians:

RECEIVED
JUL 10 2013 ^K

David W. Moon, Albert D. Mims, Ernest M. Atkinson, Richard Ellis, Daniel DeCamps, Steven Askins, Benjamin Wade Lamb, James J. Thorny, Sabrina G. O'Brien, Kristopher Crawford, Brad Russell, Marshall W. White, and

5. Employees(or former Employees) of Lake City Community Hospital:

Mike Faucette, Carmen Polly Holt, Mary Dukes, Pete Bowman, Iris Hanna, John R. "Buddy" Watkins, and

6. Unidentified persons including but not limited to

(a) unidentified employees of Lake Community Hospital who were:

(i) stationed at the Lake City, SC hospital campus (including its medical offices)

and

(ii) stationed at the Johnsonville, SC medical office, and

(b) others, whose names and identities are unknown to the Plaintiffs, who participated with the Defendants in regard to the acts and omissions complained of by the Plaintiffs as stated herein, all such Defendants whose names are unknown to the Plaintiffs and who are identified herein as multiple Jane Does and multiple John Does,

And

Lower Florence District Board d/b/a Lake City Community Hospital,

Defendants, Of Whom Nettles Turbeville and Reddick, E. Leroy Nettles, Sr.,

Elbert K.

Turbeville, Larry G. Reddick, the McNair Law Firm, and Celeste T. Jones are the Respondents.

PROOF OF SERVICE

RECEIVED
JUL 11 2013
SC Court of Appeals

I certify that I have served the Initial Brief of Appellants and a Designation of Matter on the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on July 10, 2013, addressed as follows:

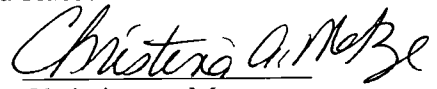
Bradish Waring
Nexsen Pruet
205 King Street, Suite 400
Charleston, SC 29401
Attorney for Lower Florence District

M. Craig Garner, Jr.
McNair Law Firm
1221 Main Street, Suite 1800
Columbia, SC 29201
Attorney for Lawyer Defendants

Robert E. Stepp
Sowell, Gray, Stepp & Lafitte, LLC
1310 Gadsden Street
Columbia, SC 29201
Attorney for Lawyer Defendants

Lawrence Orr
Orr, Elmore & Ervin, LLC
PO Box 2527
Florence, SC 29503
Attorney for Lawyer Defendants

G. Murrell Smith, Jr.
Lee, Erter, Wilson, James, Holler & Smith, LLC
PO Box 580
Sumter, SC 29150
Attorney for Defendants Crawford and Brad Russell


Christina A. Metze
Paralegal to Aimee J. Zmroczek

July 10, 2013