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AUG 30 2013

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM HORRY COUNTY

Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

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Appellate No.: 2013-001478

Civil Action No.: 2012-CP-26-3589

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Thomas Rickerson .....Appellant

vs.

John Karl, M.D. and Virginia Bell, CS, FNP. ....Respondents

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**MOTION TO STRIKE**

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Respondents John Karl, M.D. and Virginia Bell, CS, FSP (collectively, "Respondents"), hereby move to strike a portion of Appellant's Initial Brief and two (2) items listed in Appellant's Designation of Matter to be Included in the Record on Appeal. The grounds for this motion are set forth in the accompanying memorandum of law.

[SIGNATURE TO FOLLOW]

Respectfully submitted,

Sheila M. Bias

Sheila M. Bias

Marian W. Scalise

Lydia Magee

RICHARSON PLOWDEN & ROBINSON, P.A.

1900 Barnwell Street (29201)

P.O. Drawer 7788

Columbia, South Carolina 29202

803-771-4400

*Counsel for Respondents John Karl, M.D. and  
Virginia Bell, CS, FNP.*

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vs.

John Karl, M.D. and Virginia Bell, CS, FNP ..... Respondents

**CERTIFICATE OF SERVICE**

I, Laura Sabo, the undersigned employee of Richardson, Plowden & Robinson, P.A., attorneys for John Karl, M.D. and Virginia Bell, CS, FNP, to hereby certify that I have served Respondents' Motion to Strike and Memorandum in Support of Respondents' Motion to Strike in the above-referenced captioned case, by causing a copy of the same to be personally deposited in a United States Postal Service mail box, postage prepaid, with the return address clearly visible, addressed to the attorney of record as indicated below, on August 30, 2013.

William Isaac Diggs, Esquire  
1700 Oak Street, Suite D  
Myrtle Beach, SC 29577

  
\_\_\_\_\_  
Laura Sabo

Reply to: Columbia Office  
[sbias@RichardsonPlowden.com](mailto:sbias@RichardsonPlowden.com)  
Direct Dial: (803) 576-3718

August 30, 2013

*Via Hand Delivery*

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

**RE: *Thomas Rickerson v. John Karl, M.D. and Virginia Bell, CS, FNP***  
***Civil Action No.: 2012-CP-26-3589***  
***Case Tracking No. 2013-001478***

Dear Ms. Kitchings:

I have enclosed for filing an original and seven (7) copies each of the Respondents' Motion to Strike and Memorandum in Support of Respondents' Motion to Strike in the above-referenced matter, along with our Certificate of Service and the \$25 filing fee. Please return the extra file-stamped copy to our courier.

We are this day serving a copy of the same on counsel of record.

Sincerely,



Sheila M. Bias

SMB/lhs  
Enclosures

Cc: William Isaac Diggs, Esquire  
Marian Williams Scalise, Esquire  
Lydia Magee, Esquire

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