

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Maite Murphy, Circuit Court Judge

Appellate Case No. 2024-000443
Case No. 2021-CP-38-1138

Se'Anne Davis (Personal Representative for the
Estate of Adrienne Branton) Respondent,

v.

The Regional Medical Center of Orangeburg and Calhoun Counties, Appellant.

**CONSENT MOTION TO SUPPLEMENT
RECORD ON APPEAL**

The Appellant Regional Medical Center of Orangeburg and Calhoun Counties, with the consent of Respondent’s counsel, respectfully moves this Court to file a Supplemental Record on Appeal to include Defendant’s Memorandum in Opposition to Plaintiff’s Motion for Costs and Interest filed November 10, 2023, which was inadvertently not designated for inclusion in the Record on Appeal.

The Appellant’s motion is based on the following grounds:

In its Initial Briefs, the Appellant referenced arguments made to the trial court in its Memorandum in Opposition to Plaintiff’s Motion for Costs and Interest filed November 10,

2023. However, through inadvertence, that memorandum was not designated for inclusion in the Record on Appeal.

Counsel for the Appellant consulted with and has obtained consent from Respondent's counsel (see attached) for the filing of a Supplemental Record on Appeal to correct this error.

WHEREFORE, the Appellant Regional Medical Center of Orangeburg and Calhoun Counties respectfully requests that it be allowed to file a Supplemental Record on Appeal that includes Defendant's Memorandum in Opposition to Plaintiff's Motion for Costs and Interest filed November 10, 2023.

LINDEMANN LAW FIRM, P.A.

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*Counsel for Appellant Regional Medical Center of
Orangeburg and Calhoun Counties*

April 16, 2025

From: [Scott Evans](#)
To: [Andrew Lindemann](#); [James B. Moore III](#); rgoings@goingslawfirm.com; david@williamsattys.com
Cc: michaelctannerllc@bellsouth.net; [Jennifer \(Baker\) Chapman](#)
Subject: RE: Davis v The Regional Medical Center
Date: Monday, March 31, 2025 5:06:23 PM
Attachments: [image001.jpg](#)

No objection to that motion.



Scott C. Evans
Attorney at Law

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From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Monday, March 31, 2025 10:49 AM
To: James B. Moore III <james@evansmoorelaw.com>; Scott Evans <scott@evansmoorelaw.com>; rgoings@goingslawfirm.com; david@williamsattys.com
Cc: michaelctannerllc@bellsouth.net; [Jennifer \(Baker\) Chapman](#) <Jennifer@ldlawsc.com>
Subject: Davis v The Regional Medical Center

Guys:

We will be serving the Record on Appeal on you later today.

While putting the Record together, I realized that I failed to designate for inclusion in the Record on Appeal the Defendant's Memorandum in Opposition to Plaintiff's Motion for Costs and Interest filed November 10, 2023. I would like to include that in the appellate record. I plan to file a motion to file a supplemental ROA to include that memorandum. Please let me know if you will consent to that motion.

Thanks.

Andrew

Andrew F. Lindemann
Lindemann Law Firm, P.A.

RECEIVED

Apr 16 2025

SC Court of Appeals

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APPEAL FROM ORANGEBURG COUNTY
Maite Murphy, Circuit Court Judge

Appellate Case No. 2024-000443
Case No. 2021-CP-38-1138

Se'Anne Davis (Personal Representative for the
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v.

The Regional Medical Center of Orangeburg and Calhoun Counties, Appellant.

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of Lindemann Law Firm, P.A., counsel for the Appellant, does hereby certify that service of the **Consent Motion to Supplement Record on Appeal** in the above-captioned matter was made upon all counsel of record by email only this the 16th day of April 2025, as follows:

Scott C. Evans, Esquire
James B. Moore, III, Esquire
Evans Moore, LLC
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*Also Admitted in North Carolina

April 16, 2025

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Apr 16 2025

SC Court of Appeals

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

RE: Se'Anne Davis (Personal Representative for the Estate of Adrienne Branton) v.
The Regional Medical Center of Orangeburg and Calhoun Counties
Appellate Case Number: 2024-000443
Civil Action Number: 2021-CP-38-1138
Claim Number: F0164
Our File Number: 106.20709

Dear Ms. Kitchings:

Pursuant to Section (b)(2)the Supreme Court's Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), please find enclosed for filing the **Consent Motion to Supplement Record on Appeal** with regard to the above referenced appeal. By copy of this letter, I am serving copies on all counsel of record by email only pursuant to Section (d)(1) of the same Supreme Court Order.

My firm's \$50.00 check for the filing fee will be mailed to the Court via U.S. Mail. If you have any questions, please advise. Thank you for your assistance.

Sincerely,

LINDEMANN LAW FIRM, P.A.

Andrew F. Lindemann

AFL/jac
Enclosure

cc: Scott C. Evans, Esquire (w/ Enclosure, Via Email Only)
James B. Moore, III, Esquire (w/ Enclosure, Via Email Only)
David R. Williams, Esquire (w/ Enclosure, Via Email Only)
Robert F. Goings, Esquire (w/ Enclosure, Via Email Only)
Michael C. Tanner, Esquire (w/ Enclosure, Via Email Only)
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