

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 23 2025

APPEAL FROM AIKEN COUNTY
Court of Common Pleas

SC Court of Appeals

Eugene H. Griffith, Jr., Circuit Court Judge

Civil Action Case No. 2020-CP-02-02238

Appellate Case No. 2024-000592

Cassiopia RhoadsRespondent-Appellant

v.

Aiken County Sheriff's Office.....Appellant-Respondent

**DESIGNATION OF MATTER TO BE INCLUDED IN
THE RECORD ON APPEAL (SUPPLEMENTAL)**

Respondent-Appellant Rhoads designates the following to be included in the Record on Appeal:

1. Order Dismissing Defendants Southern Health Partners, Inc. and Robert J. Williams, M.D., filed December 28, 2023.
2. Order Relating to Post-Trial Motions, filed March 12, 2024.
3. Order Reducing Verdict to Statutory Cap, filed March 12, 2024.
4. Order Granting Defendant's [Sic] Motion to Alter or Amend Order and JNOV Motion, filed August 19, 2024.
5. Order Denying Defendant's Motion to Reconsider, filed September 19, 2024.
6. Notice of Intent to File Suit with Affidavit of Merit, filed May 11, 2020.
7. Summons and Complaint, filed November 17, 2020.

8. Answer of Southern Health Partners, Inc. and Robert J. Williams, M.D., filed December 30, 2020.
9. Answer of Aiken County Sheriff's Office filed February 4, 2021.
10. Transcript of Trial – Cassiopia Rhoads v. Aiken County Sheriff's Office, October 9-12, 2023.
11. Transcript from Post-Trial Motions Hearing, June 13, 2024.
12. Judge Griffith Written Jury Charges, from October 13, 2023.
13. Verdict Form, filed October 13, 2023.
14. Consent Stipulation of Partial Dismissal with Prejudice and Substitution of a Party, filed October 8, 2023.
15. Plaintiff's Memorandum Regarding S.C. Code §15-78-70(d), filed October 11, 2023.
16. Plaintiff's Motion for a Determination of Multiple Occurrences, filed October 23, 2023.
17. Defendant's Motion for Judgment Notwithstanding Verdict or Alternatively, Motion for New Trial Absolute, or Alternatively, Motion for a Reduction of Verdict to the Statutory Cap and for Set-Off of Amounts Paid by Settling Parties, filed October 23, 2023.
18. Defendant's Motion to Alter or Amend Order and/or Motion to Reconsider, filed March 22, 2024.
19. Plaintiff's Response in Opposition to Defendant's Motion to Alter or Amend Order and/or Motion to Reconsider, filed April 4, 2024.
20. Plaintiff's Motion and Request for a Hearing, filed May 22, 2024.
21. Plaintiff's Memorandum regarding S.C. Code §15-78-70(d) with exhibits, filed May 22, 2024.
22. Plaintiff's Supplemental Exhibits for Plaintiff's Memorandum regarding S.C. Code §15-78-70(d), filed June 13, 2024.
23. Plaintiff's Motion for Reconsideration, filed August 29, 2024.
24. Defendant's Motion for Summary Judgment, filed September 29, 2024.

25. Plaintiff's Response in Opposition to Defendant's Motion for Summary Judgment, filed October 5, 2023.
26. Proof of ADR, September 3, 2020.
27. Contract Between Aiken County and Southern Health Partners.
28. Aiken County Detention Center Records Relating to Cassiopia Rhoads (the portions that were trial exhibits).
29. SHP Medical Records for Cassiopia Rhoads (the portions that were trial exhibits).
30. Aiken Regional Medical Records for Cassiopia Rhoads (the portions that were trial exhibits).

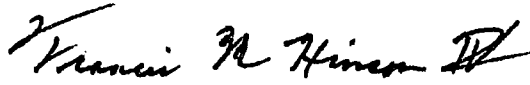
**SUPPLEMENTAL DESIGNATIONS
RE: INITIAL RESPONDENT'S BRIEF OF
RESPONDENT-APPELLANT RHOADS (filed June 23, 2025)**

31. Plaintiff's Pre-Trial Brief and Request for Pre-Trial Hearing *in limine*, filed October 3, 2023.
32. Plaintiff's Post-Trial Motion Regarding Interest and Costs and to Prohibit the Depositing of Funds with the Court Pending Appeal, filed October 23, 2023.
33. Plaintiff's Motion for a Determination of Multiple Occurrences, filed October 23, 2023.
34. Aiken County Detention Center's Inmate Rules and Regulations Form, used at trial and Exhibit No. 1 to Plaintiff's Motion for a Determination of Multiple Occurrences
35. Medical Imaging of Hole in Rhoads' Skull, used as a demonstrative exhibit during the jury trial.
36. Minimum Standards for Local Detention Facilities in South Carolina (the portions presented to the Trial Court).
37. Transcript of the Deposition of Capt. Nicholas Gallam, taken Dec. 13, 2022, made an Exhibit Plaintiff's Memorandum Regarding S.C. Code §15-78-70(d), filed October 11, 2023.
38. Transcript of the Deposition of Dr. Edward O'Bryan, presented to Judge Griffin during trial.

<signature on page following>

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

Respectfully submitted,



June 23, 2025
Columbia, SC

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