

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Judge
Case No. 2012-CP-26-3859

Thomas Rickerson

Appellant,

vs.

John Karl, M.D. and Virginia Bell, CS, FSP

Respondents

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

**LAW OFFICES OF WILLIAM ISAAC
DIGGS**
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1700 Oak Street, Suite D
Myrtle Beach, SC 25977
843-626-4243

ATTORNEY FOR APPELLANT

Other Counsel of Record:

Sheila Marlouvon Bias, Esquire
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Marian Williams Scalise, Esquire
Lydia Magee, Esquire
Richardson, Plowden & Robinson, P.A.
2103 Farlow Street, P.O. Box 3646
Myrtle Beach, Sc 29578

ATTORNEY FOR THE RESPONDENTS

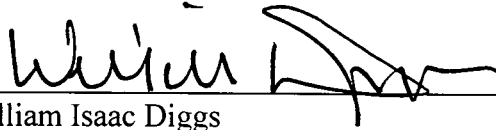
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SU Court of Appeals

COMES NOW THE APPELLANT, by and through his undersigned counsel, who would propose that the following matter be included in the Record on Appeal in this case:

1. Order of Dismissal dismissing Appellant's case with prejudice dated April 24, 2013 and filed May 2, 2013;
2. Order denying Motion to Reconsider;
3. Transcript of hearing held April 22, 2013 before the Honorable Benjamin H. Culbertson, Judge;
4. Motion to Dismiss;
5. Appellant's Response to the Motion to Dismiss;
6. Appellants' Motion to Reconsider;
7. Appellants' filing entitled Notice of Intent to File Suit filed;
8. Appellant's Amended Notice of Intent to File Suit;
9. Letter from Lydia Magee to Plaintiff's counsel seeking protection for maternity leave
10. Office of the Clerk of Court Notice of ADR filed on December 13, 2012;
11. Letter from WID to Christopher H. Pearce dated December 20, 2012
12. Letter from Christopher Pearce to counsel for each party;
13. Letter from WID to Christopher Pearce dated January 4, 2013;
14. Letter from Christopher Pearce dated January 8, 2013;
15. Letter from WID dated January 10, 2013;
16. Letter from M. Scalise dated January 10, 2013;
17. Letter from Christopher Pearce dated January 31, 2013;
18. Sanctions Roster for April 22, 2013 (single page showing this case to be heard in the morning session of court);
19. Forty five subpoenas from Lydia Magee to Appellant's medical providers;
20. Appellant's consent to subpoena and satisfactory assurance;

Respectfully submitted,

LAW OFFICES OF WILLIAM ISAAC DIGGS

A handwritten signature in black ink, appearing to read "William Diggs", is written over a horizontal line.

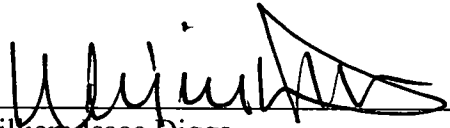
William Isaac Diggs
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ATTORNEY FOR THE APPELLANT

This 14 day of November, 2013
Myrtle Beach, South Carolina

CERTIFICATE OF COUNSEL

This is to certify that pursuant to S.C.A.C.R. 209(b) the Designation as proposed by Appellant's counsel contains no matter which is irrelevant to the appeal.



William Isaac Diggs
ATTORNEY AT LAW
1700 Oak Street, Suite D
Myrtle Beach, SC 29577
843-626-4243

ATTORNEY FOR THE APPELLANT

This 14th day of November, 2013
Myrtle Beach, South Carolina

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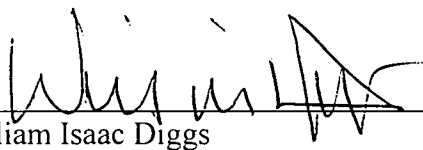
John Karl, M.D. and Virginia Bell, CS, FSP

Respondents

CERTIFICATE OF SERVICE

This is to certify that I have this 14th day of November, 2013, deposited one copy of the Amended Initial Brief of Appellant and the Amended Appellant's Designation of Matter to be included in the Record on Appeal in the U.S. Postal Service with proper postage affixed thereto and addressed to opposing counsel as follows:

Sheila Marlouvon Bias
Marian Williams Scalise
Richardson Plowden & Robinson, P.A.
1900 Barnwell Street
Columbia, SC 29201-2604



William Isaac Diggs

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