

Dec 11 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

Supreme Court Case No. 2025-000563

Rita Pratt, Individually and ..... Respondent,  
as the Personal Representative  
of the Estate of William Pratt,  
deceased,

v.

Amisub of South Carolina, Inc.  
d/b/a Piedmont Medical Center;  
Jaleesa Heyward, RN; South  
Carolina Emergency Physicians,  
LLC; Jonas Varaly, DO; Rock  
Hill Radiology Associates, LLC;  
and Geoffrey T. Gilleland, MD, ..... Defendants,

Of which Rock Hill Radiology  
Associates LLC and Geoffrey T.  
Gilleland, MD are the ..... Petitioners.

**RESPONDENT’S MOTION FOR LEAVE  
TO SUPPLEMENT THE RECORD ON APPEAL**

Pursuant to Rule 212(b), SCACR, Respondent Rita Pratt, Individually and as the Personal Representative of the Estate of William Pratt, hereby moves for leave to supplement the Record on Appeal to add three pages from the trial transcript. Ms. Pratt’s motion is based on the following grounds:

1. The Record on Appeal for this medical malpractice appeal contains portions but not all of the February 2020 trial transcript.
2. Concerning the announcement of Ms. Pratt's settlement with Defendant Amisub of South Carolina, Inc. d/b/a Piedmont Medical Center ("Amisub"), Petitioners Rock Hill Radiology Associates LLC and Geoffrey T. Gilleland, MD and Ms. Pratt included in their designations for inclusion in the Record on Appeal the three-page section (Transcript P. 638-40) where the announcement was made.
3. The three pages preceding the settlement announcement (Transcript P. 635-37, attached as **EXHIBIT 1**) were not designated for inclusion in the Record on Appeal because they contain no substantive information from the trial proceedings.
4. Since the Amisub settlement announcement took place at the beginning of a new day's trial proceedings (February 7, 2020), the court reporter placed the announcement at the beginning of a new volume of the trial transcript. Transcript P. 635-37, therefore, consist of (1) that volume's cover page; (2) an "appearances" page listing all counsel of record; and (3) an "index" page listing that volume's contents.
5. Petitioners' Reply Brief challenges the trial transcript's accuracy and sufficiency in presenting the Amisub settlement announcement by asserting "[t]hree pages are missing at this point in the transcript." (Reply Br. at 2) (citing Pratt v. Amisub of S.C., Inc., 445 S.C. 199, 231 n. 10, 912 S.E.2d 268, 285 n. 10 (Ct. App. 2025)).
6. Transcript P. 635-37 are the three pages to which Petitioners' assertion refers, they are not in any sense "missing," and they should be included in the Record on Appeal to provide the Court a sufficient basis for assessing Petitioners' arguments regarding the trial transcript's contents.

7. Pursuant to Rule 212(b), SCACR, Ms. Pratt's attorneys contacted Petitioners' counsel on the morning of December 9, 2025, seeking consent to a Supplemental Record on Appeal. Petitioners' counsel has not responded.

For all these reasons, Ms. Pratt respectfully request an order granting her leave to file a Supplemental Record on Appeal with Transcript P. 635-37.

Respectfully submitted,

/s/ Jordan C. Calloway

Chad A. McGowan (SC Bar No. 9943)

Ashley White Creech

Eve S. Goodstein

Jay F. Wright (SC Bar No. 78738)

Jordan C. Calloway (SC Bar No. 78728)

McGowan, Hood, Felder & Phillips, LLC

1539 Health Care Drive

Rock Hill, SC 29732

(803) 327-7800

Attorneys for Respondent

December 11, 2025  
Rock Hill, SC