

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY  
COURT OF COMMON PLEAS

Alison Renee Lee, Circuit Court Judge

CASE NO.: 2011-CP-32-02282

Tanya Bennett, as Next Friend of  
Mykelvion T., a minor.....Appellant,  
v.

Lexington County Health Services District, Inc.  
d/b/a Lexington Medical Center.....Respondent.

DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

RECEIVED

JAN 27 2014


SC Court of Appeals

Appellant proposes the following to be included in the Record on Appeal:

- (1) All pleadings, except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- (2) All Orders except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- (3) All Motions except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- (4) Defendant's Memorandum in Support of Motion for Summary Judgment;
- (5) Defendant's Supplemental Memorandum in Support of Motion for Summary Judgment;
- (6) Defendant's exhibits attached to Memoranda;

- (7) Affidavit of Tanya Bennett;
- (8) Affidavit of Dr. Redmond;
- (9) Pages of depositions from which excerpts were cited in the Briefs;
- (10) Transcript of proceedings held on March 11, 2013 before The Honorable Alison Renee Lee;
- (11) Notice of Appeal by Appellant;
  
- (12) Any other document cited in Appellant's Initial Briefs.

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



---

Edward L. Graham  
J. Layton Ruffin  
GRAHAM LAW FIRM, P.A.  
383 W. Cheves St.  
Florence, SC 29501  
(843) 662-3281-T  
(843) 665-0254-F

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

---

C/A No. 2011-CP-32-02282

---

**RECEIVED**

JAN 27 2014

**SC Court of Appeals**

Tanya Bennett, as Next Friend of  
Mykelvion T., a minor

Appellant,

v.

Lexington County Health Services  
District, Inc. d/b/a Lexington Medical Center,  
Medical Center,

Respondent.

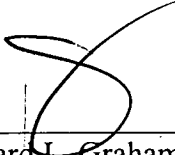
---

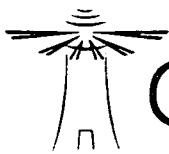
PROOF OF SERVICE

---

The undersigned, an attorney in this matter for the Appellant, certifies that I have this 22nd day of January, 2014 served copies of the Initial Appellant's Brief and Appellant's Designation of Matter to be Included in the Record on Appeal upon counsel for the Respondent by depositing them in the United States mail, first-class postage prepaid, addressed to:

Weldon R. Johnson, Esq.  
Barnes, Alford, Stork & Johnson, LLP  
P.O. Box 8448  
Columbia, SC 29202

  
\_\_\_\_\_  
Edward L. Graham  
GRAHAM LAW FIRM, P.A.  
P.O. Box 550  
Florence, SC 29501  
843-662-3281-T  
843-662-0254-F



# GRAHAM LAW

*Shining a Light on Safety, Guiding the Way to Justice.*

Edward L. Graham  
Diane M. Rodriguez, RN-JD  
Mary H. Watters  
J. Layton Ruffin

January 22, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RE: Tanya Bennett, as Next Friend of Mykelvion T., a minor v.  
Lexington County Health Services District, Inc. d/b/a Lexington  
Medical Center  
Appellate Case No.: 2013-001410**

Dear Ms. Kitchings,

Enclosed for filing please find Appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal in the above-referenced case. By copy of this letter, I am serving attorney for Respondent, Weldon R. Johnson, with a copy of the same.

With kindest personal regards, I am

Yours Very Truly,

EDWARD L. GRAHAM

ELG/kb  
Encl.  
cc: Weldon R. Johnson, Esq.

**RECEIVED**

JAN 27 2014

**SC Court of Appeals**

GRAHAM LAW FIRM, P.A.  
383 West Cheves Street, Florence, SC 29501  
P.O. Box 550, Florence, SC 29503  
Phone 843.662.3281 or 1.877.475.8877 • Fax 843.665.0254