

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

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Case No. 2013-CP-23-1622

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Greenville Hospital System and  
GHS Partners in Health, Inc., ..... Respondents,

v.

Tammy Denise Shaw and  
David Shaw, ..... Appellants.

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**RESPONDENTS' DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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Respondents Greenville Hospital System and GHS Partners In Health, Inc. ("GHS"), propose the following matter to be included in the Record on Appeal in addition to the matter previously designated by the Appellants:

1. Summons and Complaint, including Exhibits A, B and C (filed March 19, 2013);
2. Defendants' Answer and Counterclaim (filed April 18, 2013);
3. Defendants' Amended Answer and Counterclaim (filed April 18, 2013);
4. Plaintiffs' Motion to Dismiss Defendants' Amended Counterclaims (filed May 20, 2013);

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**SC Court of Appeals**

5. Greenville Hospital System and GHS Partners In Health, Inc.'s Memorandum of Law In Support of Motion to Dismiss Counterclaims, including Exhibits A, B and C (filed June 19, 2013);
6. Order Dismissing Defendants' Counterclaims (filed July 17, 2013);
7. Order Denying Defendants' Motion to Reconsider (filed August 14, 2013).

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

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.



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H. Sam Mabry, III, S.C. Bar No. 3490  
Charles M. Sprinkle, S.C. Bar No. 70630  
Sarah T. Clemmons, S.C. Bar No. 74093

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Attorneys for Respondents  
Greenville Hospital System and  
GHS Partners in Health, Inc.

February 21, 2014

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**PROOF OF SERVICE**

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The undersigned hereby certifies that, on the date indicated below, he served counsel for the Appellants with a copy of Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

David L. Thomas, Esq.  
Moore, Taylor & Thomas, P.A.  
23 Wade Hampton Blvd.  
Greenville, SC 29609  
(864) 271-6371

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Respectfully submitted,



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February 21, 2014

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February 21, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, S.C. 29211

Re: Greenville Hospital System and GHS Partners in Health, Inc. v. Tammy Denise Shaw and David Shaw  
Appellate Case No. 2013-001965  
Greenville County Case No. 2013-CP-23-1622  
HSB No.: 08565.0616

Dear Ms. Kitchings:

Enclosed for filing are the original and one copy each of the Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal, together with our Proofs of Service of same. After filing, please return a file-stamped copy to me in the enclosed self-addressed, postage paid envelope.

By copy of this letter, I am serving copies of same upon counsel for Appellants, David L. Thomas, Esq.

Please feel free to contact me should you have any questions or concerns.

Very truly yours,

HAYNSWORTH SINKLER BOYD, P.A.



Charles M. Sprinkle

CMS/lma  
Enclosures

cc: David L. Thomas, Esq.

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