

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM YORK COUNTY
John C. Hayes, III, Circuit Court Judge

Appellate Case No.; 2014-000388

RECEIVED

APR -7 2014

S.C. Supreme Court

Ann P. Adams, as Personal Representative of the Estate
of Jacob E. Adams, Deceased, Petitioner,

v.

Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center and d/b/a
Piedmont Healthcare System; Staci L. Versen-Rampey, NP, Individually and as Agent,
Servant, Employee of South Carolina Emergency Physicians, LLC, and as Agent,
Servant, or Employee of Amisub of South Carolina, Inc. d/b/a Piedmont Healthcare
System; Jason Price, Radiologic Technologist, Individually and as Agent, Servant, or
Employee of Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center and d/b/a
Piedmont Healthcare System; James E. Reinhardt, Jr., M.D., Individually and as
Agent Servant or Employee of Rock Hill Radiology Associates, PA. and
as Agent, Servant or Employee of Amisub of South Carolina, Inc., d/b/a Piedmont
Medical Center and d/b/a Piedmont Healthcare System, and Rock Hill Radiology
Associates, P.A. South Carolina Emergency Physicians, LLC, Defendants,

Of whom Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center and d/b/a
Piedmont Healthcare System; Staci L. Versen-Rampey, NP, Individually and as
Agent, Servant, Employee of South Carolina Emergency Physicians, LLC, and as
Agent, Servant, or Employee of Amisub of South Carolina, Inc. d/b/a Piedmont
Healthcare System; Jason Price, Radiologic Technologist, Individually and as
Agent, Servant, or Employee of Amisub of South Carolina, Inc., d/b/a
Piedmont Medical Center and d/b/a Piedmont Healthcare System are Respondents.

REPLY TO THE RETURN FOR
WRIT OF CERTIORARI

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TABLE OF AUTHORITIES

Cases

Ranucci v. Crain, 397 S.C. 168; 723 S.E. 2d 242; (S.C. App. 2012) 1

REPLY

Respondents are correct in that Ranucci v. Crain, 397 S.C. 168, 723 S.E.2d 242 (S.C. App. 2012) controls this case. *Ranucci* is the law of this State unless either reversed or overruled. However this Court has granted certiorari to consider the *Ranucci* decision.

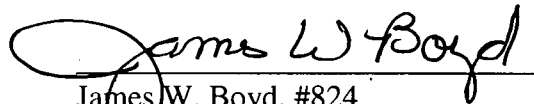
The Respondent contends that the Petitioner's claim is barred by the statute of limitations based on the concurring opinion in *Ranucci*. It should be noted that neither in the *Ranucci* case nor in the present case did the majority follow the reasoning on the concurring opinion in the *Ranucci* case.

The Return notes that §16-36-100 does not ever toll the statute of limitations. However Section 15-79-125 provides that filing the Notice of Intent to File Suit tolls all applicable statutes of limitations. The issue before the Court in this case and in the *Ranucci* case is whether or not the Notice of Intent to File Suit was properly filed. If the Court affirms the *Ranucci* decision then the statute of limitations would apply in this case. If the Court does not affirm the *Ranucci* decision then the Appellant properly filed the Notice of Intent to File Suit and the statute of limitations was tolled.

CONCLUSION

For the reasons set forth above this Court should grant certiorari in this case.

Respectfully submitted,



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April 3, 2014
Rock Hill, South Carolina

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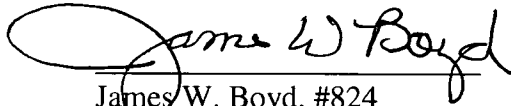
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Associates, P.A. South Carolina Emergency Physicians, LLC, Defendants,

Of whom Amisub of South Carolina, Inc., d/b/a Piedmont Medical Center and d/b/a
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Piedmont Medical Center and d/b/a Piedmont Healthcare System are Respondents.

PROOF OF SERVICE

I, James W. Boyd, certify that I served the within Reply to Return of Petition for a
Writ of Certiorari on Respondent by depositing a copies of the same in the United States

mail, postage prepaid, on April 3, 2014, addressed to the Respondents' attorney of record,
N. Heyward Clarkson, III, PO Box 6728, Greenville, SC 29606.

A handwritten signature in black ink that reads "James W. Boyd". The signature is written in a cursive style with a large, looping initial "J".

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April 3, 2014