

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes III, Circuit Court Judge

Case No. 2012-CP-07-3595

**RECEIVED**  
APR 08 2014  
**SC Court of Appeals**

Charles Gary, ..... Respondent,

v.

Hattie M. Askew, Will Outlaw, and Deboria Outlaw,  
individually and d/b/a Low Country Medical Transport,  
Low Country Medical Transport, Inc., Eugene A. Kirkland,  
and American Medical Response, Inc. (d/b/a Access2Care) ..... Defendants

Of whom American Medical Response, Inc. (d/b/a  
Access2Care) is, ..... Appellant.

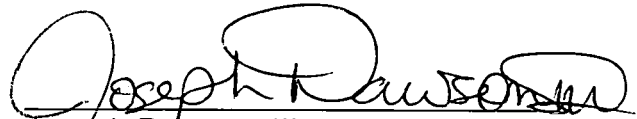
**RESPONDENT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent proposes the following be included in the Record on Appeal:

1. Order Granting Summary Judgment filed August 20, 2013
2. Order on Reconsideration Modifying the August 20, 2013, Summary Judgment Order, filed December 3, 2013
3. Complaint
4. Answer of American Medical Response filed November 21, 2012
5. Amended Answer of American Medical Response filed December 12, 2012

6. Plaintiff's Motion for Summary Judgment filed February 26, 2013
7. Plaintiff's Memorandum of Law in Support of Summary Judgment Motion filed May 14, 2013 with Exhibits A, B, C, D, E, F, G, H, I, J, K, and M to the Memorandum of Law
8. Plaintiff's Supplemental Memorandum of Law in Support of Summary Judgment Motion dated May 20, 2013
9. Plaintiff's Supplemental Memorandum of Law in Support of Summary Judgment Motion on its Negligence Cause of Action with Exhibit A, dated July 16, 2013
10. American Medical Response's Memorandum in Opposition to Plaintiff's Motion for Summary Judgment, dated May 9, 2013
11. American Medical Response's Supplemental Memorandum in Opposition to Plaintiff's Motion for Summary Judgment, dated May 28, 2013
12. American Medical Response's Supplemental Memorandum in Opposition to Summary Judgment filed August 9, 2013
13. American Medical Response's Motion to Reconsider and Supplemental Memorandum in Opposition to Summary Judgment, filed September 3, 2013
14. Plaintiff's Memorandum of Law in Response to American Medical Response's Motion to Reconsider, filed September 17, 2013

I certify that this Designation of Matter contains no matter which is irrelevant to this appeal.

A handwritten signature in black ink that reads "Joseph Dawson, III". The signature is written in a cursive style with large, rounded letters.

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Attorney for Respondent Charles Gary

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April 5, 2014

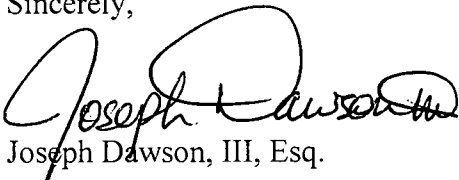
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RE: Charles Gary v. Hattie M. Askew, Will Outlaw, and Deboria Outlaw, individually and d/b/a LowCountry Medical Transport, Low Country Medical Transport Inc., Eugene A. Kirkland, and American Medical Response, Inc., d/b/a Access2Care  
Case Number 12-CP-07-3595  
Appellate Case # 2013-002674

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Initial Brief of Respondent and Designation of Matter in the above-referenced matter. Please file the same and return a date-stamped filed copy to me in the enclosed self-addressed stamped envelope.

Sincerely,



Joseph Dawson, III, Esq.

cc: Brian P. Crotty, Esquire  
Erin D. Dean, Esquire  
Cory Fleming, Esquire  
H. Cooper Wilson, III, Esquire

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and American Medical Response, Inc. (d/b/a Access2Care) ..... Defendants

Of whom American Medical Response, Inc. (d/b/a  
Access2Care) is, ..... Appellant.

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**CERTIFICATE OF SERVICE**

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I certify that I have served the **Initial Brief of Respondent Charles Gary** and **Designation of Matter to be Included in the Record on Appeal** on all parties to the appeal by depositing a copy of the same in the United States Mail, postage prepaid, on April 5, 2014, addressed to its counsel of record as follows:

C. Mitchell Brown, Esq.  
Brian P. Crotty, Esq.  
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A handwritten signature in cursive script that reads "Joseph Dawson, III". The signature is written in black ink and is positioned above a horizontal line.

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