



# 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

April 21, 2014

The Honorable Daniel E. Shearouse  
South Carolina Supreme Court Clerk  
1231 Gervais St.  
Columbia, SC 29201

**RECEIVED**

APR 21 2014

**SC Court of Appeals**

RE: Jamesetta Washington, as Guardian ad Litem for Jayden W., a minor v. Edmund Rhett, Jr., M.D., Low Country Obstetrics and Gynecology, P.A.; Tenet South Carolina, Inc. d/b/a East Cooper Regional Medical Center and AMN Services, Inc. f/k/a Nurses RX Inc.

Case No.: 2007-CP-10-1553

Dear Mr. Shearouse,

Enclosed for filing is the original and six (6) copies of a Petition for Writ for Certiorari in the above referenced matter. Also, enclosed are the following:

1. Proof of Service of the Petition;
2. Two (2) copies of the Appendix consisting of the following:
  - (a) Decision of the Court of Appeals;
  - (b) Appellant's Petition for Rehearing;
  - (c) Respondent's Return to Appellant's Petition for Rehearing;
  - (d) Order of the Court of Appeal's Denying Petition for Rehearing;

Also included per Rule 226(e) are two (2) copies of the following:

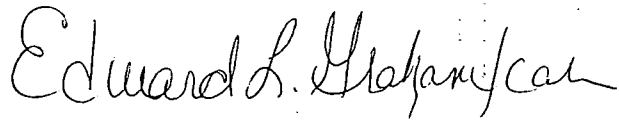
- (e) Record on Appeal, Volumes I – VIII;
- (f) Appellant's Final Brief;
- (g) Respondent's Final Brief; and
- (h) Appellant's Final Reply Brief

and a check for \$100.00 for the filing fee.

I am also filing a copy of the Petition for Writ of Certiorari with Proof of Service with the Clerk of the Court of Appeals.

With kindest personal regards, I am

Yours Very Truly,

A handwritten signature in cursive script that reads "Edward L. Graham". The signature is written in dark ink and is positioned above the printed name.

Edward L. Graham

ELG/cah

cc: Jenny Abbott Kitchings, Clerk, SC Court of Appeals ✓

Robert H. Hood, Esq.

Molly H. Craig, Esq.

Deborah H. Sheffield, *Of Counsel*

STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM CHARLESTON COUNTY  
Circuit Court

The Honorable Michael J. Baxley, Circuit Court Judge

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Case No.: 2007-CP-10-1553

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Jamesetta Washington, as Guardian ad Litem for  
Jayden W., a minor .....Petitioner,

vs.

Edmund Rhett, Jr., M.D., Low Country Obstetrics and Gynecology, P.A.; Tenet  
South Carolina, Inc. d/b/a East Cooper Regional Medical Center and AMN  
Services, Inc. f/k/a Nurses RX Inc.,.....Defendants,

OF WHOM Edmund Rhett, Jr., MD is .....Respondent.

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PROOF OF SERVICE

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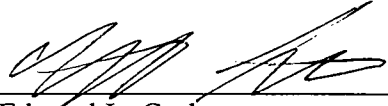
The undersigned, an attorney in this matter for the Appellant, certifies that I have this 21<sup>st</sup> day of April 2014 served copies of a Petition for Writ of Certiorari upon counsel for the Respondents by depositing them in the United States mail, first-class postage prepaid, addressed to:

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter St.  
Columbia, SC 29201

Counsel served:

Robert H. Hood  
Molly H. Craig  
Deborah H. Sheffield, *of counsel*  
Hood Law Firm, LLC  
172 Meeting St  
Charleston, SC 29401

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APR 21 2014  
SC COURT OF APPEALS



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Attorney for Petitioner