

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM Charleston COUNTY  
Court of Common Pleas

J. C. Nicholson, Circuit Court Judge

Case No. 2013-CP-10-03054

RECEIVED

MAY 12 2014

SC Court of Appeals

Willie Preston, individually and as the Personal Representative of the Estate of Martha Preston, Deceased. ....Appellant,

v.

Surgical Care Affiliates, LLC; Charleston Surgery Center, L.P.; Laura Bilancione, R.N.; Coastal Anesthesia Associates; and Christine Thompson, MD..... Defendants,

Of Whom

Coastal Anesthesia Associates is the, ..... Respondent,

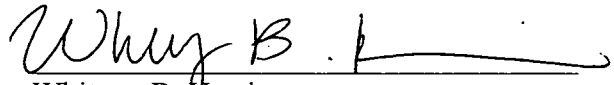
**APPELLANT'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD  
ON APPEAL**

Appellant designates the following items to be included in the Record on Appeal, pursuant to Rule 209 of the South Carolina Appellate Court Rules:

1. 2014 Order;
2. 2014 Form 4;
3. 2013 Default Order;
4. Complaint;
5. Answer;
6. Coastal's Motion for Dismiss for Lack of Subject Matter Jurisdiction, or in the Alternative, to Set Aside Entry of Default;
7. Coastal's Memorandum in Support and Exhibits;

8. Appellant's Memo in Opposition and Exhibits;
9. Coastal's Registered Agent Information;
10. Proof of Service of Summons and Complaint signed by Janet Hawkins;
11. Chad McGowan's Affidavit;
12. Public Records Index;
13. Affidavit of Dr. Kerns;
14. Affidavit of Wendy Sanders;
15. Charleston Surgery Center-Directions & More,  
<http://www.charlestonsurgerycenter.com/Directionsandmore> (accessed Dec. 16, 2013);
16. Chad McGowan's Letter to Court considering December 18, 2013 hearing; and
17. Transcript from December 18, 2013 hearing.

Respectfully submitted,



Whitney B. Harrison  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, South Carolina 29201  
(803) 779-0100  
[wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)

Chad A. McGowan  
Ashley W. Creech  
McGowan, Hood & Felder, LLC  
1539 Healthcare Drive  
Rock Hill, South Carolina 29730  
(803) 327-7800  
(803) 328-5656 Facsimile  
[cmcgowan@mcgowanhood.com](mailto:cmcgowan@mcgowanhood.com)  
[acreech@mcgowanhood.com](mailto:acreech@mcgowanhood.com)

John Hughes Cooper  
1476 Ben Sawyer Blvd, Suite 7  
Mt. Pleasant, SC 29464  
843-883-9099  
843-883-9335 (Fax)

Columbia, South Carolina

May 12, 2014

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM Charleston COUNTY  
Court of Common Pleas

J. C. Nicholson, Circuit Court Judge

Case No. 2013-CP-10-03054

Willie Preston, individually and as the Personal Representative of the Estate of Martha Preston, Deceased. ....Appellant,

v.

Surgical Care Affiliates, LLC; Charleston Surgery Center, L.P.; Laura Bilancione, R.N.; Coastal Anesthesia Associates; and Christine Thompson, MD..... Defendants,

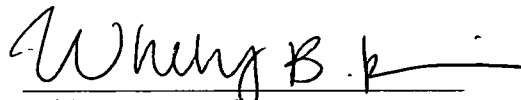
Of Whom

Coastal Anesthesia Associates is the, ..... Respondent,

**PROOF OF SERVICE**

I, Whitney B. Harrison, Attorney with McGowan, Hood & Felder, LLC do hereby certify that on May 12, 2014, I served a copy of the following *Initial Appellant's Brief and Designation of Matter* by depositing in the United States mail in Columbia, South Carolina with proper postage prepaid to the following:

James Hood  
172 Meeting Street  
Charleston, SC 29401



Whitney B. Harrison  
MCGOWAN HOOD & FELDER, LLC  
1517 Hampton Street  
Columbia, South Carolina 29201  
Telephone: (803) 779-0100  
Facsimile: (803) 256-0702

# McGowan, Hood & Felder, LLC

Chad A. McGowan (SC, GA, NC)  
S. Randall Hood  
John G. Felder, Jr.  
W. Jones Andrews, Jr.  
Jordan C. Calloway  
Susan F. Campbell  
Ashley White Creech  
Ruskin C. Foster  
Lara Pettiss Harrill



Whitney Harrison  
Patrick M. Killen  
William A. McKinnon (SC, DC)  
Daniel "Ernie" Peagler  
Robert V. Phillips  
Seth Rose  
James Stephen Welch\* (SC, OK)  
Joseph G. Wright, III\*  
Of Counsel\*

Writer's Email: [wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)

May 12, 2014

The Honorable Jenny Kitchings  
Clerk of South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**

MAY 12 2014

**SC Court of Appeals**

RE: *Willie Preston, individually and as the Personal Representative of the Estate of Martha Preston, Deceased, v. Surgical Care Affiliates, LLC; Laura Bilancione R.N.; Coastal Anesthesia Associates and Christine Thompson, MD.* (13-CP-10-03054).

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the Proof of Service, Appellant's Designation of Matter to be included in the Record on Appeal, and Initial Brief of Appellant in the above referenced matter. Thank you for your assistance and if you have any questions please feel free to contract me.

With kind regards, I am

A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is written in a cursive style with a long horizontal line extending to the right.

Whitney B. Harrison

Enclosure

Cc: James Hood