

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2009-CP-10-4943

RECEIVED
JUN 23 2014
SC Court of Appeals

Barbara Roehm,

Appellant,

v.

Leigh McKenzie, MD,
Ira Rosenshein, MD,
Charla McEachin Napier, LMFT,
Coastal Psychiatry, LLC,

Defendants,

Of whom Leigh McKenzie, MD and
Charla McEachin Napier, LMFT are

Respondents.

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

Respondent proposes the following to be included in the Record on Appeal in addition to the matters designated by Appellant:

1. Motion for Summary Judgment Exhibits A through F attached to Defendant McKenzie's Memorandum in Support of Summary Judgment filed November 26, 2012:
 - (A) Affidavit of Barbara Roehm dated November 20, 2007 (also filed as Exhibit D to Defendant McKenzie's Reply Memorandum in Support of Summary Judgment);
 - (B) Initial Complaint and exhibits filed August 10, 2009;
 - (C) Deposition of Barbara Roehm, Vol. 2, April 20, 2012 (also filed as Exhibit B to Defendant McKenzie's Reply Memorandum in Support of Summary Judgment);
 - (D) Affidavit of Leigh McKenzie dated August 17, 2007;

- (E) Deposition of Barbara Roehm, Vol. 1, September 9, 2010; and
 - (F) Notice of Intent to File Suit and exhibits dated January 12, 2011.
2. Motion for Summary Judgment Exhibits A and C attached to Defendant McKenzie's Reply Memorandum in Support of Summary Judgment filed May 29, 2013:
- (A) Deposition of Leigh McKenzie, MD, April 16, 2013; and
 - (C) Deposition of Ira Rosenshein, MD, January 20, 2012.
3. Defendant McKenzie's Memorandum in Opposition to Motion to Reconsider filed July 19, 2013.

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

Respectfully submitted,



D. GARY LOVELL, JR.
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Attorneys for Respondents
Leigh McKenzie, MD and Coastal
Psychiatry, LLC

June 18, 2014

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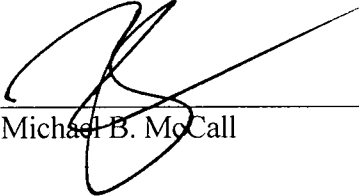
I certify that on the date indicated below, I served Respondent Leigh McKenzie, MD's *Initial Brief of Respondent and Designation of Matters to be Included in the Record on Appeal* on all parties by depositing a copy of it in the United States Mail, postage prepaid, on June 18, 2014, addressed to the parties' attorneys of record as follows:

Sally C. Dey, Esq.
Dey Law Firm, LLC
3 Gamecock Ave, Suite 306
Charleston, SC 29407

Paul E. Tinkler, Esq.
154 King Street
Third Floor
Charleston, SC 29401

Eric G. Fosmire, Esq.
The Fosmire Law Firm, LLC
P.O. Box 153
Columbia, SC 29202

This 18th day of June, 2014



Michael B. McCall

LAW OFFICES

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MICHAEL B. MCCALL

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June 18, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Barbara Roehm v. Leigh McKenzie, MD, *et al.*
Appellate Case No.: 2013-001903
CCS File Nos.: 3469-40554

Dear Ms. Kitchings:

Enclosed please find for filing in the above-reference matter the Initial Brief of Respondent, Respondent's Designation of Matters to be Included in the Record on Appeal, and proof of service of the same on Appellant.

By copy of this correspondence, I have served the same upon all counsel of record. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,



MICHAEL B. McCALL

MBM:tjr
Enclosures

cc: Sally C. Dey, Esq.
Paul E. Tinkler, Esq.
Eric G. Fosmire, Esq.

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SC COURT of Appeals

The Honorable Jenny Abbott Kitchings
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