

August 8, 2014

Beverly D. Wilson
Post Office Box 2865
Orangeburg, South Carolina 29116
(803)682-0697
(803)536-6008 (fax)
Email: wilsonfam63@yahoo.com

South Carolina Court of Appeals
Clerk of Court
Jenny Abbott Kitchings
1205 Pendleton Street
Columbia, SC 29201
(803)734-1890
(803)734-1839 (fax)

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AUG 08 2014

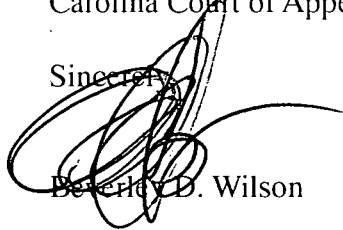
SC Court of Appeals

Re: Beverly D. Wilson, Appellant vs. Stephen P. Williams, Respondent
Original Case Number: 2013-CP-23-5177
Appellate Case No.: 2013-002688

Dear Ms. Kitchings:

I respectfully file one (1) unbound, double-sided copy of the Record on Appeal, fourteen (14), double-sided, properly bound copies of the Record on Appeal, and fourteen (14) properly bound copies of the Final Brief of Appellant to be submitted to the South Carolina Court of Appeals in the above referenced case. I have also submitted three (3) properly bound, double-sided copies of the Record on Appeal and three (3) properly bound copies of the Final Brief of Appellant to opposing counsel, Michael D. Glenn, Esquire, by depositing same in the U.S. Mail today. I enclose herewith a copy of the Certificate of Service submitted to Mr. Glenn. Please time stamp these documents and file them with the South Carolina Court of Appeals.

Sincerely,



Beverly D. Wilson

August 8, 2014

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P.O. Box 2865
Orangeburg, SC 29116
(803)682-0697
(803)536-6008 (fax)
Email: wilsonfam63@yahoo.com

CERTIFICATE OF SERVICE

Michael D. Glenn
GLENN, HAIGLER & STATHAKIS, LLP
Attorneys at Law
121 West Benson Street
Anderson, SC 29624
(864)226-1885 (office)
(864)224-9677 (office)
(864)226-0561 (fax)

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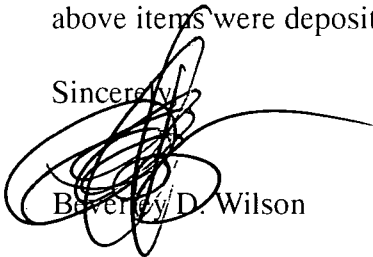
SC Court of Appeals

Re: Beverley D. Wilson vs. Stephen P. Williams
Original Case Number: 2013-CP-23-5177
Appellate Case No.: 2013-002688

Mr. Glenn:

I hereby enclose three (3) properly bound, double-sided copies of the Record on Appeal and three (3) properly bound copies of the Final Brief of Appellant along with a copy of the letter submitted today to Jenny Abbott Kitchings, Clerk of Court for the South Carolina Court of Appeals. I certify that the above items were deposited in the U.S. Mail today.

Sincerely,



Beverley D. Wilson

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* Note:

Letter to The Honorable Eric Holder July 6, 2012 was not included in this list of exhibits or presented to the Court or discussed in any court proceedings in this case and is thus barred from being included in the Designated Matter and is not included in the Record on Appeal.

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CERTIFICATE OF APPELLANT

I certify that the Record on Appeal contains all material proposed to be included by the Appellant and Respondent with the exception of Appellant's Letter to The Honorable Eric Holder which is inadmissible as an item to be included in the Designation of Matter as it was not presented to the Lower Courts or presented/discussed in any proceedings of the Lower Courts. No other material has been included in the Record on Appeal.

July 17, 2014



s/ Beverley D. Wilson
Beverley D. Wilson
Post Office Box 2865
Orangeburg, SC 29116
(803) 682-0697
Pro Se Appellant

Other Counsel of Record:
Michael D. Glenn
GLENN, HAIGLER, AND
STATHAKIS, LLP
121 West Benson Street
Anderson, SC 29624
Attorney for Respondent
(864) 226-1885
(864) 224-9677

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SC Court of Appeals

1 STATE OF SOUTH CAROLINA)
2 COUNTY OF RICHLAND)
3 BEVERLEY D. WILSON,)
4 Plaintiff,)
5 vs.)
6 STEPHEN P. WILLIAMS)
7 and)
8 HAYNSWORTH, SINKLER,)
9 BOYD, P.A.,)
10 Codefendants.)

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
CIVIL ACTION NUMBER:
~~2013-CP-40-3101~~

**AMENDED
COMPLAINT**

11 Plaintiff, Beverley D. Wilson, complaining of Codefendants, Stephen P. Williams
12 and Haynsworth, Sinkler, Boyd, P.A., would show unto this Honorable Court:

13 1. Plaintiff is a physician existing and practicing under the laws of the State
14 of South Carolina, in Orangeburg County as Wilson Pediatrics, Inc.

15 2. Upon information and belief, Codefendant Stephen P. Williams is a
16 resident of Greenville County and a citizen of the State of South Carolina.

17 3. Codefendant Stephen P. Williams was employed as an attorney by
18 Codefendant Haynsworth, Sinkler, Boyd, P.A. in March 2008 and the during the duration
19 of the time he was engaged by the Plaintiff to represent the Plaintiff in a legal capacity in
20 the State of South Carolina vs. Beverley D. Wilson case.

21 4. Codefendant Haynsworth, Sinkler, Boyd, P.A. has an office in Columbia,
22 South Carolina, in the County of Richland, South Carolina.

1 5. Codefendant Haynsworth, Sinkler, Boyd, P.A. had a supervisory employer
2 relationship with Codefendant Stephen P. Williams and is vicariously responsible for the
3 conduct of Codefendant Stephen P. Williams according to S.C. Code Section 15-38-
4 15(C)(3)(a). As an employer of Codefendant Stephen P. Williams, Codefendant
5 Haynsworth, Sinkler, Boyd, P.A. had a duty to supervise, review, and provide oversight
6 of Codefendant Stephen P. Williams' legal activities.

7 6. The majority of the meetings between Plaintiff and Codefendant Stephen
8 P. Williams occurred in Codefendant Haynsworth, Sinkler, Boyd, P.A.'s Columbia,
9 South Carolina office, located in Richland County, South Carolina. As such, per S.C.
10 Code Section 15-7-30A(10) and S.C. Code Section 15-7-30A(11D1), Richland County,
11 South Carolina is the appropriate Venue for this case.

12 7. Codefendant Stephen P. Williams as a non-resident of Richland County,
13 South Carolina performed business while employed by a corporation in Richland County,
14 South Carolina while legally engaged by Plaintiff in the case of State of South Carolina
15 vs. Beverley D. Wilson which gave rise to the course of action in this matter. Therefore,
16 according to S.C. Code Section 15-7-100, Richland County, South Carolina is the proper
17 Venue for the present matter before the Court.

18 8. In March 2008, South Carolina Department of Medicaid conducted an
19 audit of Plaintiff's medical practice, Wilson Pediatrics, Inc. On this date, the Plaintiff,
20 Beverley D. Wilson, contacted the South Carolina Medical Association (SCMA) for legal
21 advice and was referred to the Codefendant, Stephen P. Williams who was employed as a
22 practicing attorney with Codefendant Haynsworth, Sinkler, Boyd, P.A.. SCMA had
23 previously advised all of its member physicians to immediately contact them should the

1 STATE OF SOUTH CAROLINA)
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 4 Plaintiff,)
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