

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

S. Jackson Kimball, Circuit Court Judge

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Case No. 2009-CP-46-5195

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Angela Patton, as Next Friend of  
Alexia L., a minor,

Appellant,

v.

Dr. Gregory A. Miller, Rock Hill Gynecological & Obstetrical Associates, P. A.  
and Amisub of South Carolina, d/b/a Piedmont Medical Center,

Respondents.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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SEP 29 2014

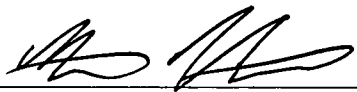
**SC Court of Appeals**

Appellant proposes the following to be included in the Record on Appeal:

- (1) All pleadings, except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- (2) All Orders except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- (3) All Motions except those, if any, which may hereafter be agreed upon by all parties for exclusion at the completion of the briefing process;
- (4) Defendant Amisub's Memorandum in Support of Motion for Partial Summary Judgment;

- (5) Plaintiff's Memorandum Opposing Defendants' Motions for Partial Summary Judgment;
- (6) Defendant Amisub's Memorandum in Opposition to Plaintiff's Motions to Alter or Amend and For Leave to Amend Complaint
- (7) Plaintiff's Motion to Alter or Amend Judgment and Memorandum of Law in Support
- (8) Plaintiff's Motion for Leave to Amend Complaint
- (9) Pages of depositions from which excerpts were cited in the Briefs;
- (10) Transcript of proceedings held on July 18, 2013 before The Honorable S. Jack Kimball;
- (11) Transcript of proceedings held on October 17, 2013 before The Honorable Jackson Kimble, III;
- (12) Notice of Appeal by Appellant;
- (13) Any other document cited in Appellant's Initial Briefs.

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

  
\_\_\_\_\_  
Edward L. Graham  
J. Layton Ruffin  
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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 **25th day of September, 2014** served copies of the Appellant's Reply Brief and Appellant's Designation of Matter to be Included in the Record on Appeal upon counsel of record for the Respondents by depositing them in the United States mail, first-class postage prepaid, addressed to:

Ashby W. Davis, Esq.  
Davis & Snyder, P.A.  
5 Hawthorne Park Ct.  
Greenville, SC 29615

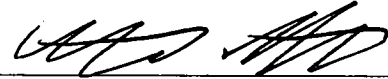
R. Hawthorne Bennett, Esq.  
Turner, Padgett, Graham & Laney, P.A.  
Post Office Box 1473  
Columbia, SC 29202

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SEP 29 2014

**SC Court of Appeals**

William U. Gunn, Esq.  
Holcombe Bomar, P.A.  
Post Office Drawer 1897  
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Edward L. Graham  
Diane M. Rodriguez, RN-JD  
J. Layton Ruffin

September 25, 2014

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

**RE: Angela Patton, as Next Friend of Alexia L., a minor v. Dr. Gregory A. Miller, Rock Hill Gynecological & Obstetrical Associates, P.A. and Amisub of South Carolina, Inc. d/b/a Piedmont Medical Center**

**C/A No.: 09-CP-46-5195  
Appellate Case No.: 2013-002670**

Dear Ms. Kitchings,

Enclosed for filing please find the originals and one copy of each of the following materials: (1) Appellant's Reply Brief; (2) the Designation of Matter to be included in the Record on Appeal; and (3) the Proof of Service in the above-referenced case. By copy of this letter, I am serving attorneys for Respondents with a copy of the same.

With kindest personal regards, I am

Yours Very Truly,

EDWARD L. GRAHAM

ELG/kb  
Encl.

cc: Ashby W. Davis, Esq.  
R. Hawthorne Bennett, Esq.  
William U. Gunn, Esq.

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**SC Court of Appeals**

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