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Carmelo B. Sammataro

E-mail: SSammataro@TurnerPadget.com

Writer's Direct Dial: (803) 227-4253

Writer's Direct Fax: (803) 400-1532

September 17, 2014

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SEP 18 2014

SC Court of Appeals

Ms. Gertrude Shiver
Appellant, *Pro Se*
1026 Congaree Church Road
Gadsden, SC 29052

Re: Gertrude Shiver v. Palmetto Health Richland, Key Risk Management Services, Inc., Palmetto Hospital Trust Services, Trident Regional Medical Center and Zurich American Insurance Company
Appellate Tracking No.: 2013-000887
File No.: 1329.238

Dear Ms. Shiver:

We are in receipt of your request for copies of voluminous materials to be included in the Record on Appeal, as well as your motion to compel those documents, regarding the above-referenced matter. As you have previously rejected Respondents' offer to prepare the Record on Appeal, we will be glad to provide you with copies of the documents subject to pre-payment of reasonable copying and postage costs. To that end, I have enclosed for your review and processing an invoice in the amount of \$99.58 (464 pages at \$.20 per page, along with \$6.78 to cover the cost of mailing these documents to you). Once we have received your payment, we will proceed with copying and delivery.

- In responding to your request in this manner, please note that Respondents specifically reserve and do not waive any valid objections they may have to the Record on Appeal once you have served and filed the same with the South Carolina Court of Appeals. Further, it is our position that in responding to your request, your motion to compel should be deemed moot and that it will not be necessary to file a return in opposition to that motion. Please let me know if you disagree.

Thank you in advance for your time and attention. I look forward to receiving your response and stand ready to assist as needed to move the parties to a timely resolution of this appeal.

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September 17, 2014
Page 2

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Carmelo B. Sammataro

CBS/tj
Enclosure

cc: The Honorable Jenny Abbott Kitchings
Lana H. Sims, Jr., Esquire
Andrew W. Fajardo, Esquire
Allison M. Carter, Esquire
(w/enc.)

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The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
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