

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS  
CIRCUIT COURT JUDGE

**RECEIVED**

OCT 14 2014

**SC Court of Appeals**

C.A. NO. 2013-CP-10-00088  
CT. APP. NO.: 2013-001673

BEVERLY C. MOORE-ROWE ..... Appellant,

vs.

BON SECOURS-ST. FRANCIS XAVIER HOSPITAL, INC., D/B/A BON SECOURS ST. FRANCIS XAVIER HOSPITAL, BON SECOURS ST. FRANCIS HOSPITAL AND ROPER ST. FRANCIS HEALTHCARE; BON SECOURS ST. FRANCIS HEALTH SYSTEM, INC., D/B/A BON SECOURS ST. FRANCIS XAVIER HOSPITAL, BON SECOURS ST. FRANCIS HOSPITAL AND ROPER ST. FRANCIS HEALTHCARE; BON SECOURS HEALTH SYSTEM, INC., D/B/A BON SECOURS ST. FRANCIS HOSPITAL AND ROPER ST. FRANCIS HEALTHCARE; ROPER ST. FRANCIS FOUNDATION, D/B/A ROPER ST. FRANCIS HEALTHCARE; BON SECOURS-ST. FRANCIS HEALTH SYSTEM FOUNDATION, INC., D/B/A ROPER ST. FRANCIS HEALTHCARE; ROPER HOSPITAL, INC., D/B/A ROPER ST. FRANCIS HEALTHCARE; BYRON N. BAILEY, M.D.; CHRISTINE C. THOMPSON, M.D., A/K/A CHRISTINE THOMPSON, M.D.; CHARLESTON NEUROSURGICAL ASSOCIATES, LLC; MT. PLEASANT ANESTHESIA ASSOCIATES, PA; CHARLESTON SURGERY CENTER LIMITED PARTNERSHIP, D/B/A CHARLESTON SURGERY CENTER; TAMMY MCGRAW, CRNA, ALSO KNOWN AS TAMMY MCGRAW SPEICHER, CRNA; NURSE ANESTHESIA OF SOUTH CAROLINA, LLC; JEFFERY S. WAGER, CRNA; TRICOASTAL HEALTHCARE BILLING AND MANAGEMENT, INC.; AND STEVEN HEATH COBB

..... Respondents,

PROOF OF SERVICE

I certify that I have served a copy of the Amended Record On Appeal on the Respondents listed above, with all enclosures referenced therein, by depositing a copy of it in the United States Mail, postage prepaid, on Friday, October 10, 2014, addressed to the Respondents' Attorneys of record, as listed below:

Darren K. Sanders, Esquire  
Buyck & Sanders & Simmons, LLC  
P.O. Box 2424  
Mount Pleasant, S.C. 29465-2424

Attorney for Respondents, Byron N. Bailey, M.D. and  
Charleston Neurological Associates, LLC

Fred W. Suggs, III, Esquire  
Roe, Cassidy, Coates & Price, P.A.  
P.O. Box 10529  
Greenville, S.C. 29603

Attorney for Respondents, Bon Secours Health Systems, Inc., Bon Secours St.  
Francis Health System Foundation, Inc., Bon Secours St. Francis Hospital

Jack G. Gresh, Esquire  
Hall Booth Smith, P.C.  
40 Calhoun Street, Suite 550  
Charleston, S.C. 29401

Attorney for Respondent, Charleston Surgery Center Limited Partnership d/b/a  
Charleston Surgery Center

Andrew S. Halio, Esquire  
Halio & Halio, PA  
PO Box 747  
Charleston S.C. 29402-0747

Attorney for Respondent, Steven Heath Cobb

Jonathan H. Dunlap, Esquire  
Batten Lee, PLLC  
4141 Parklake Avenue, Suite 350  
Raleigh, N.C. 27612

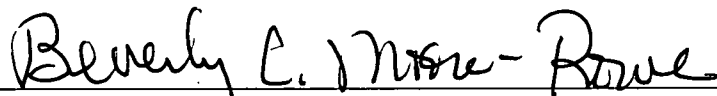
Attorney for Respondents, Nurse Anesthesia Of South Carolina, LLC, Jeffery Wager, CRNA, and Tammy McGraw, CNRA a/k/a Tammy McGraw Speicher, CNRA

Hood Law Firm, LLC  
Attention: Robert H. Hood, Esquire  
Attention: James B. Hood, Esquire  
Attention Deborah H. Sheffield, Esquire  
P.O. Box 1508  
Charleston S.C. 29402-1508

Attorneys for Respondent, Christine C. Thompson, M.D.

Young Clement Rivers, LLP  
Attention: Christine Kent Toporek, Esquire  
Attention: Stephen L. Brown, Esquire  
Attention: Joseph J. Tierney, Jr., Esquire  
Attention: Russell Grainer Hines, Esquire  
P.O. Box 993  
Charleston, S.C. 29402

Attorneys for Respondents, Bon Secours-St. Francis Xavier Hospital, Inc., d/b/a Bon Secours St. Francis Xavier Hospital, and Roper St. Francis Healthcare, Bon Secours St. Francis Health System, Inc., d/b/a Bon Secours St. Francis Xavier Hospital and Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper St. Francis Foundation, d/b/a Roper St. Francis Healthcare, Roper St. Francis Healthcare, Roper Hospital, Inc., d/b/a Roper St. Francis Healthcare.



BEVERLY C. MOORE-ROWE, Pro Se  
Plaintiff/Appellant  
52 Chadwick Drive  
Charleston, South Carolina 29407  
Telephone: (843) 763-2599; (843) 737-0733

Charleston, South Carolina  
Dated: October 10, 2014

October 28, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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OCT 30 2014

SC Court of Appeals

Re: Beverly C. Moore-Rowe v. Bon Secours-St. Francis Xavier Hospital, Inc., d/b/a Bon Secours St. Francis Xavier Hospital, Bon Secours St. Francis Hospital and Roper St. Francis Healthcare, Bon Secours St. Francis Health System, Inc., d/b/a Bon Secours St. Francis Xavier Hospital, Bon Secours St. Francis Hospital and Roper St. Francis Healthcare, Bon Secours Health System, Inc., d/b/a Bon Secours St. Francis Hospital and Roper St. Francis Healthcare, Roper St. Francis Foundation, d/b/a Roper St. Francis Healthcare, Bon Secours-St. Francis Health System Foundation, Inc., d/b/a Roper St. Francis Healthcare, Roper Hospital, Inc., d/b/a Roper St. Francis Healthcare, Byron N. Bailey, M.D., *Christine C. Thompson, M.D., a/k/a Christine Thompson, M.D.*, Charleston Neurosurgical Associates, LLC, Mt. Pleasant Anesthesia Associates, PA, Charleston Surgery Center Limited Partnership, d/b/a Charleston Surgery Center, Tammy McGraw, CRNA, also known as Tammy McGraw Speicher, CRNA, Nurse Anesthesia of South Carolina, LLC, Jeffery S. Wager, CRNA, Tricoastal Healthcare Billing and Management, Inc., and Steven Heath Cobb C/A No. 2013-CP-10-00088 (NOI), Charleston CP Appellate Case No. 2013-001673  
HLF File No.: 242.163

Dear Madam Clerk:

Enclosed for filing please find the original and fifteen (15) copies of the Final Brief of Respondents, including our Certification of Counsel and Certificate of Service, regarding the above-referenced case. Please return a clocked-in copy of each in the envelope provided. By copy of this letter, I am serving the Pro-se Appellant and all counsel.

Kind regards,

Yours truly,

  
James B. Hood

JBH/jad

Enclosures

cc: Beverly C. Moore-Rowe / Arthur Peter Rowe  
Christine K. Toporek, Esquire  
Fred W. Suggs, III, Esquire  
Darren K. Sanders, Esquire  
Jack G. Gresh, Esquire  
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Beverly C. Moore-Rowe

52 Chadwick Drive  
Charleston, S.C. 29407  
(843) 737-0733

October 10, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

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OCT 14 2014

**SC Court of Appeals**

RE: Amended Record On Appeal

Case: Beverly C. Moore-Rowe vs. Bon Secours-St Francis Xavier Hospital, Inc.,  
et al

Court Of Appeals Case Number: 2013-001673

Charleston County Civil Action No.: 2013-CP10-00088

Dear Madam or Sir:

Pursuant to the Order of this Honorable Court dated September 12, 2014, I am required to serve all Respondents with a paper copy of an Amended Record on Appeal within thirty (30) of the date of the Order. Accordingly, I am enclosing fourteen (14) bound copies and one (1) unbound copy of the Amended Record On Appeal in this matter. I am also enclosing the original and a copy of the Affidavit of Service.

By copy of this letter, I am simultaneously serving the Respondents with a paper copy of the Amended Record on Appeal by and through the Attorneys of Record.

I am respectfully requesting that you please file the above-referenced original documents and return the enclosed copy of the Affidavit of Service, marked as filed, in the enclosed self-addressed stamped envelope provided. Thank you for your assistance in this matter.

Thank you for your consideration.

Sincerely yours,

*Beverly C. Moore-Rowe*

Beverly C. Moore-Rowe

BCR-R  
Enclosures

Letter to the Honorable Ms. Kitchings  
Friday, October 10, 2014  
Page 2

BEVERLY C. MOORE-ROWE

cc:

James B. Hood, Esquire, Hood Law Firm, w/encl.

Christine K. Toporek, Esquire, Young Clement Rivers, LLP, w/encl.

Fred W. Suggs, III, Esquire, Roe, Cassidy Coates & Price, P.A., /encl.

Darren K. Sanders, Esquire, Buyck, Sanders & Simmons, LLC, w/encl.

Jack G. Gresh, Esquire, Hall Booth Smith, P.C., w/encl.

Jonathan H. Dunlap, Esquire, Batten Lee PLLC, w/encl.

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