

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2011-CP-10-0934

**RECEIVED**  
DEC 01 2014  
**SC Court of Appeals**

Virginia L. Marshall and  
Todd W. Marshall, ..... Appellants,

v.

Kenneth A. Dodds, M.D., Charleston  
Nephrology Associates, LLC, Georgia  
Roane, M.D., and Rheumatology  
Associates, P.A., ..... Respondents.

**DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**


1. Summary Judgment Order as to Dr. Roane;
2. Summary Judgment Order as to Dr. Dodds;
3. Order Denying Plaintiffs' Motion to Reconsider;
4. Notice of Intent to File Suit of February 7, 2011 (Dr. Dodds);
5. Complaint of February 7, 2011 (Dr. Dodds);
6. Affidavit of Dr. Luke dated February 7, 2011;
7. Notice of Intent to File Suit of April 8, 2011 (Dr. Roane);
8. Complaint of April 8, 2011 (Dr. Roane);
9. Affidavit of Dr. Zizic dated April 8, 2011;
10. Dr. Roane's Motion for Summary Judgment;
11. Dr. Roane's Memo in Support of her Motion for Summary Judgment;
12. Dr. Dodds' Motion for Summary Judgment;
13. Dr. Dodds' Memo in Support of his Motion for Summary Judgment
14. Plaintiffs' Motion for Reconsideration;
15. Memo in Opposition to Motion for Reconsideration (Dr. Dodds);

16. Memo in Opposition to Motion for Reconsideration (Dr. Roane);
17. Plaintiffs' Reply in Support of Motion for Reconsideration;
18. Elliott letter to Nicholson of 3/4/14;
19. Deposition of Dr. Luke pp. 141-172;
20. Deposition of Dr. Zizic pp. 54-76 and pp. 125-126;
21. Transcript of Summary Judgment Hearing;
22. Transcript of Hearing on Plaintiffs' Rule 59 Motion.

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

December 1, 2014

Respectfully submitted,



Blake A. Hewitt, SC Bar # 73674

John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

P.O. Box 7965

Columbia, SC 29202

(803) 779-7599

(803) 779-8995 (facsimile)

bhewitt@bntdlaw.com

jsnichols@bntdlaw.com

Attorneys for Appellants

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

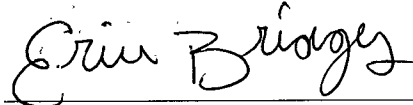
James B. Hood, Esquire  
Robert H. Hood, Esquire  
H. Cooper Wilson, III, Esquire  
Hood Law Firm, LLC  
P.O. Box 1508  
Charleston, SC 29402

Thomas R. Goldstein, Esquire  
Belk Cobb Infinger & Goldstein, PA

P.O. Box 71121  
Charleston, SC 29415-1121

James E. Scott, IV, Esquire  
D. Jay Davis, Jr., Esquire  
Perry M. Buckner, IV, Esquire  
Young Clement Rivers  
P.O. Box 993  
Charleston, SC 29402

December 1, 2014  
Columbia, South Carolina



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Erin Bridges  
BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC



December 1, 2014

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Marshall v. Dodds  
Case Tracking No.: 2014-001833

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Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of the Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal in regards to this matter. I have also enclosed a Proof of Service upon counsel for the Respondents. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges  
Paralegal to Blake Hewitt  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: J. Edward Bell, III, Esquire  
C. Carter Elliott, Jr., Esquire  
James B. Hood, Esquire  
Thomas R. Goldstein, Esquire  
D. Jay Davis, Jr., Esquire