

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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FEB 04 2015

APPEAL FROM LEXINGTON COUNTY  
William P. Keesley, Circuit Court Judge

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**SC Court of Appeals**

Case No. 2007-CP-32-1981

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Martha Lewin Argoe, ..... Appellant,

v.

Three Rivers Behavioral Health, LLC and  
Psychiatric Solutions, Inc., its successor;  
Phyllis Bryant-Mobley, MD; David A. Steiner, MD;  
Cheryl C. Dodds, MD; Doris Ann Burrell, RN and  
the Carolina Care Plan, ..... Respondents.

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**RESPONDENT PHYLLIS BRYANT-MOBLEY, M.D.'S  
DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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The Respondent Phyllis Bryant-Mobley, M.D., proposes that the following be included in the Record on Appeal::

1. Order Granting Partial Summary Judgment in Favor of Defendants Three Rivers Behavioral Health, LLC, filed March 7, 2014
2. Order on Reconsideration filed June 9, 2014

3. Second Amended Complaint
4. Answer to Second Amended Complaint of Defendant Phyllis Bryant-Mobley, M.D., filed January 23, 2012
5. Notice of Motion and Motion for Summary Judgment of Defendant Phyllis Bryant-Mobley, M.D.
6. Memorandum in Support of Motion for Summary Judgment on Behalf of Defendant Phyllis Bryant-Mobley, M.D.
7. Affidavit of Glenn Hooker, M.D.
8. Affidavit of Phyllis Bryant-Mobley, M.D. (with attachments)
9. Affidavit of Cheryl C. Dodds, M.D. (with attachments)
10. Deposition of Phyllis Bryant-Mobley, M.D., pp. 1, 73, 86, 92, 100-101
11. Order of Probate Judge Marvin Lawson dated June 13, 2005
12. Order of Probate Judge Marvin Lawson dated June 21, 2005
13. Order of Probate Judge Tiffany Provence dated January 18, 2007
14. Order of Judge Diane S. Goodstein, filed January 5, 2010
15. Transcript of Motion Hearing, August 29, 2013

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

DAVIDSON & LINDEMANN, P.A.

BY:  \_\_\_\_\_

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*Counsel for Respondent*  
*Phyllis Bryant-Mobley, M.D.*

Columbia, South Carolina

January 30, 2015

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the Carolina Care Plan, ..... Respondents.

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**CERTIFICATE OF SERVICE**

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The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondent Phyllis Bryant-Mobley, M.D., does hereby certify that service of the **Initial Brief of Respondent Phyllis Bryant-Mobley, M.D. and Respondent Phyllis Bryant-Mobley, M.D.'s Designation of Matter to be Included in the Record On Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 30th day of January 2015:

Robert D. Dodson, Esquire  
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# DAVIDSON & LINDEMANN, P.A.

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January 30, 2015

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

RE: Martha Lewin Argoe v. Three Rivers Behavioral Health, LLC and Psychiatric Solutions, Inc., its successor; Phyllis Bryant-Mobley, MD; David A. Steiner, MD; Cheryl C. Dodds, MD; Doris Ann Burrell, RN and the Carolina Care Plan  
Appeal Tracking Number: 2014-001511  
Civil Action Number: 2007-CP-32-1981  
Claim Number: CB074518M  
Our File Number: 22.7456

Dear Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the **Initial Brief of Respondent Phyllis Bryant-Mobley, M.D. and Respondent Phyllis Bryant-Mobley, M.D.'s Designation of Matter to be Included in the Record On Appeal** with regard to the above referenced matter. Please file the originals and return a clocked-in copy of each document to me in the enclosed envelope.

By copy of this letter, I am serving copies on all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosures

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
January 30, 2015  
Page Two

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cc: (w/ Enclosures)

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