

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Charleston County  
Court of Common Pleas

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

**RECEIVED**  
MAR 06 2015

**SC Court of Appeals**

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Case No. 2011-CP-10-0934

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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.

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**RESPONDENTS GEORGIA ROANE, M.D. AND  
RHEUMATOLOGY ASSOCIATES, P.A.'s  
DESIGNATION OF MATTER**

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YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No 66468)  
D. Jay Davis, Jr. (SC Bar No 12084)  
James E. Scott, IV (SC Bar No 09063)  
Perry M. Buckner, IV (SC Bar No 100031)  
Russell G. Hines (SC Bar No 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Respondents  
Georgia Roane, M.D. and  
Rheumatology Associates, P.A.*

Respondents Georgia Roane, M.D. and Rheumatology Associates, P.A. propose the following matter to be included in the Record on Appeal:

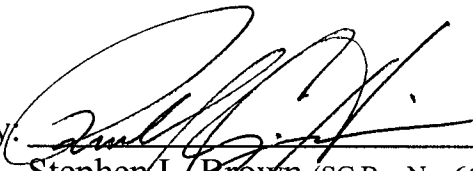
1. Summons and Complaint (against Dr. Roane);
2. Dr. Roane's Motion for Summary Judgment;
3. Dr. Roane's Memorandum in Support of Summary Judgment;
4. Motion Hearing Transcript (March 3, 2014);
5. The Marshalls' Counsel's Letter to Judge Nicholson dated March 4, 2014;
6. Dr. Roane's Counsel's Letter to Judge Nicholson dated March 5, 2014;
7. The Marshalls' Counsel's Letter to Judge Nicholson dated March 7, 2014;
8. Order Granting Dr. Roane Summary Judgment filed May 2, 2014;
9. Motion to Alter or Amend and for Reconsideration;
10. Notice of Appearance (by attorneys Nichols and Hewitt);
11. Reply in Support of the Marshalls' Rule 52 and & 59 Motions;
12. Motion Hearing Transcript (July 16, 2014);
13. Order Denying Motion to Reconsider filed August 7, 2014;
14. Dr. Roane's Memorandum in Opposition to Marshalls' Motion for Reconsideration; and

15. Motion Hearing Transcript (July 16, 2014).

Counsel for these Respondents certify that this Designation of Matter contains no matter that is irrelevant to this appeal.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:   
Stephen L. Brown (SC Bar No 66468)  
D. Jay Davis, Jr. (SC Bar No 12084)  
James E. Scott, IV (SC Bar No 09063)  
Perry M. Buckner, IV (SC Bar No. 100031)  
Russell G. Hines (SC Bar No 72100)  
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*Attorneys for Respondents  
Georgia Roane, M.D. and  
Rheumatology Associates, P.A.*

Charleston, South Carolina

Dated: 3/4/15

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Respondents.

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP  
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(843) 720-5488  
*Attorneys for Respondents*  
*Georgia Roane, M.D. and*  
*Rheumatology Associates, P.A.*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondents Georgia Roane, M.D. and Rheumatology Associates, P.A., do hereby certify that I have served (1) the **INITIAL BRIEF OF RESPONDENTS GEORGIA ROANE, M.D. AND RHEUMATOLOGY ASSOCIATES, P.A.** and (2) the **RESPONDENTS GEORGIA ROANE, M.D. AND RHEUMATOLOGY ASSOCIATES, P.A.'s DESIGNATION OF MATTER** on all other parties to this appeal by depositing copies of the same in the United States Mail, postage prepaid, on March 4, 2015, addressed as follows to their counsel of record:

Blake A. Hewitt, Esquire  
John S. Nichols, Esquire  
Bluestein Nichols Thompson Delgado, LLC  
P.O. Box 7965  
Columbia, SC 29202

*-and-*

J. Edward Bell, III, Esquire  
Bell Legal Group, LLC  
P.O. Box 2590  
Georgetown, SC 29442

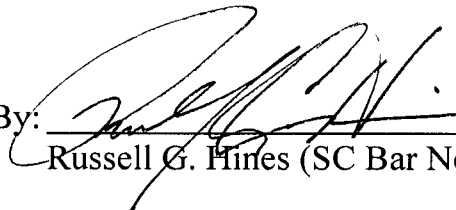
*-and-*

C. Carter Elliott, Jr., Esquire  
Elliott & Phelan, LLC  
P.O. Box 1405  
Georgetown, SC 29442  
*Attorneys for Appellants*  
*Virginia L. Marshall and Todd W. Marshall*

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172 Meeting Street  
Charleston, SC 29401  
*Attorneys for Respondents*  
*Kenneth A. Dodds, M.D. and*  
*Charleston Nephrology Associates, LLC*

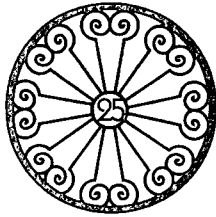
Thomas R. Goldstein, Esquire  
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P.O. Box 71121  
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*Attorney for Respondent*  
*Kenneth A. Dodds, M.D.*

YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines (SC Bar No. 72100)

Charleston, South Carolina

Dated: 3/4/15



**YCR LAW**

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

**50 YEARS**

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
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March 4, 2015

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

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MAR 06 2015

**SC Court of Appeals**

Re: Virginia L. Marshall and Todd W. Marshall v. Kenneth A. Dodds, M.D.,  
Charleston Nephrology Associates, LLC, Georgia Roane, M.D. and  
Rheumatology Associates, P.A.  
Appellate Case No.: 2014-001833  
Circuit Case No.: 2011-CP-10-0934  
YCR File: 2466-20110384

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and two copies of Respondent's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service regarding the same.

Kindly return one clocked copy in the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes  
Secretary

/kbb  
Enclosures

cc: C. Carter Elliott, Jr., Esquire, Elliott & Phelan, LLC  
J. Edward Bell, III, Esquire, Bell Legal Group, LLC  
Blake A. Hewitt, Esquire, Bluestein Nichols Thompson Delgado, LLC  
John S. Nichols, Esquire, Bluestein Nichols Thompson Delgado, LLC  
James B. Hood, Esquire, Hood Law Firm, LLC  
Robert H. Hood, Esquire, Hood Law Firm  
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