

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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MAR 16 2015  
SC Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

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Case No. 12-ALJ-17-0405-AP

Appellate Case No. 2014-001457

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CareAlliance Health Services d/b/a Roper St. Francis                      Respondent,  
Healthcare, .....  
v.  
South Carolina Department of Revenue, .....                      Appellant.

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**MOTION TO SUPPLEMENT RECORD ON APPEAL**

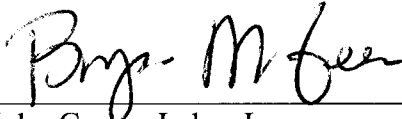
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Pursuant to Rule 210 of the South Carolina Appellate Court Rules, Respondent CareAlliance Health Services d/b/a Roper St. Francis Healthcare ("Roper") moves this Court to allow it to supplement the Record on Appeal ("Record") to include two additional pages of a deposition transcript. Roper inadvertently omitted two pages of Dr. McCrosson's deposition transcript, which were cited in Roper's Initial Brief, from its Designation of Matter such that these pages are not included in the Record on Appeal.

Counsel for Appellant South Carolina Department of Revenue consents to this request to supplement the Record.

Therefore, Roper respectfully moves this Court for an order allowing it to file a Supplement to the Record on Appeal.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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*Attorneys for Respondent*

Charleston, South Carolina  
March 12, 2015

THE STATE OF SOUTH CAROLINA  
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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Case No. 12-ALJ-17-0405-AP

Appellate Case No. 2014-001457

CareAlliance Health Services d/b/a Roper St. Francis Healthcare ..... Respondent,

v.

South Carolina Department of Revenue, ..... Appellant.

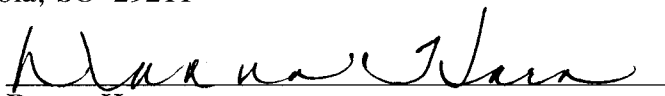
**PROOF OF SERVICE**

I the undersigned Administrative Assistant of the law firm of Nelson Mullins Riley & Scarborough, LLP, attorneys for CareAlliance Health Services d/b/a Roper St. Francis Healthcare, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: Motion to Supplement Record on Appeal

Counsel Served:

Lauren Acquaviva  
Milton G. Kimpson  
Counsel for Litigation  
Office of General Counsel for Litigation  
South Carolina Department of Revenue  
PO Box 12265  
Columbia, SC 29211

  
Donna Horn  
Administrative Assistant

March 13, 2015

# Nelson Mullins

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MARCH 13 2015  
SC Court of Appeals

March 13, 2015

**VIA FEDERAL EXPRESS**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1015 Sumter Street, 5<sup>th</sup> Floor  
Columbia, SC 29201

RE: CareAlliance Health Services d/b/a Roper St. Francis Healthcare v. South Carolina  
Department of Revenue  
Docket No.: 12-ALJ-17-0405-CC  
Appellate Case No. 2014-001457  
Our file No.: 38103/09000

Dear Ms. Kitchings:

Enclosed are the originals and one copy of the following motions in the above matter:

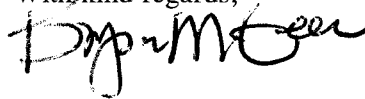
1. Motion to Supplement Record on Appeal; and
2. Motion for Extension of Time to File Final Brief of Respondent.

We also enclose two checks in the amount of \$25 each to cover the fees associated with filing these motions.

Please file the original motions and return the clocked-in copies to me in the envelope provided. By copy of this letter, we are serving counsel for the Respondent, who consents to both of these motions.

Thank you for your assistance with this matter.

With kind regards,



Bryson M. Geer

BMG:dh

Enclosure

cc: (w/enclosures)  
Lauren Acquaviva, Esq.  
Milton G. Kimpson, Esq.

From: (843) 853-5200  
Bryson Geer  
Nelson Mullins  
Liberty Center, Suite 600  
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SC Court of Appeals

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**ATTN Stormy**  
**South Carolina Court of Appeals**  
**1015 SUMTER ST FL 5**

**COLUMBIA, SC 29201**

**MON - 16 MAR 10:30A**  
**PRIORITY OVERNIGHT**

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