

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Hon. Alison R. Lee, Circuit Court Judge

Case No. 2011-CP-4003561

**RECEIVED**

MAR 19 2015

**SC Court of Appeals**

Gertrude Shiver,.....Claimant, Appellant,

v.

Palmetto Health Richland, Employer,  
Key Risk Management Services, Inc., TPA  
Palmetto Hospital Trust Services, Carrier,  
Trident Regional Medical Center, Employer,  
Zurich American Insurance Company, Carrier.....Respondents,

**MOTION TO ACCEPT THE AMENDED DESIGNATION OF MATTER OF JANUARY 29, 2015**

I am submitting a request to the Appellate Court for it to please accept the Amended Designation of Matter of January 29, 2015.

After the Amended Designation of Matter of October 15, 2014, was submitted and I was in the process of finishing compiling the documents for binding and completing the Index, I discovered that there was some misnumbering because of skipping and human errors starting with page 50 throughout the document, therefore; there was a need to redo the Amended Designation of Matter. In trying to make the Index as accurate as possible, I had to fix the numbering of the documents. In addition, there was some redundancy of the documents; especially the medical records and they had to be taken out especially, the Moore Orthopaedic Clinic dated July 26, 2006,

Midland Orthopaedics, PA dated 2-14-02, Miller Orthopaedic Clinic, Inc. dated 15/05/03, Healthworks treatments dated 1/24/03, In Med-Diagnostics Services of S. C., LLC dated 1/24/01, University Specialty Clinics and Orthopaedics Evaluation dated 9/4/03, Emergency Department-Palmetto Richland Memorial Hospital 10/24/02, Dr. Thomas Brandt notes, Emergency Department- Palmetto Richland Memorial Hospital dated October 24, 2003, and Healthworks. Midlands Internal Medicine partial notes were added.

There was a need to add the Appellant's APA's that was inadvertently left out but indicated in the Appellant's Amended Initial Brief and the Appellant's APA's for each claim that was part of the hearing. The inclusion of the book was made because Appellant didn't have seventeen individual copies to submit.

After correcting these errors, I had to submit to the Court an Amended Designation of Matter that corresponded with the Index that was included in the Record on Appeal.

Therefore, I am asking the Court to please accept the Amended Designation of Matter of January 29, 2015.

Respectfully submitted,

March 19, 2015



Gertrude Shiver, Pro se'  
1026 Congaree Church Rd.  
Gadsden, S. C. 29052  
(803) 353-3892

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Trident Regional Medical Center, Employer,  
Zurich American Insurance Company, Carrier,.....Respondent,

CERTIFICATE OF SERVICE

I certify that I have served the Motion to Accept the Amended Designation of Matter of January 29, 2015, on Palmetto Health Richland and Palmetto Health Trust Services, by depositing a copy of it in the United States Mail, postage paid, on March 19, 2015, addressed to its attorney of record, Andrew W. Fajardo, 1501 Main Street, 5<sup>th</sup> floor, Columbia, South Carolina 29201.

March 19, 2015

*Gertrude Shiver*  
Gertrude Shiver, Pro se  
1026 Congaree Church Rd.  
Gadsden, S. C. 29052  
(803) 353-3892

March 19, 2015

Jenny A. Kitchings, Clerk  
1015 Sumter Street  
Columbia, S. C. 29201

Re: Submission of Motion To Accept the Amended Designation of Matter for January  
29, 2015 and the Motion for the Correction

of the Record on Appeal.

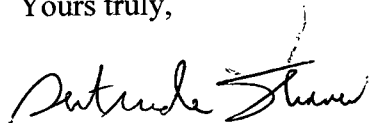
Gertrude Shiver v. Palmetto Health Richland, et al. Appellate Case No.2013000887

Dear Ms. Kitchings,

Enclosed are the original and six copies of the Motion for the Acceptance of the  
Amended Designation of Matter of January 29, 2015, and an original and six copies of  
the Motion for Permission to correct the Record on Appeal.

Also, The Certificate of Service for each Attorney for each motion is included. The  
checks of \$25.00 for each Motion have already been submitted.

Yours truly,



Gertrude Shiver  
1026 Congaree Church Rd.  
Gadsden, S. C. 29052  
(803) 353-3895

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MAR 19 2015

**SC Court of Appeals**

cc. Attorneys Allison M. Carter, Carmelo B. Sammataro, and Andrew W. Fajardo