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APR 29 2015

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Case No. 2007-CP-32-01981

Martha Lewin Argoe, v. Appellant,

Three Rivers Behavioral Health, LLC; Phyllis Bryan-Mobley, MD; David A. Steiner, MD; Cheryl C. Dodds, MD; Doris Ann Burrell, RN, Respondent,

**MOTION TO SUPPLEMENT DESIGNATION OF MATTER AND SUPPLEMENT THE RECORD ON APPEAL**

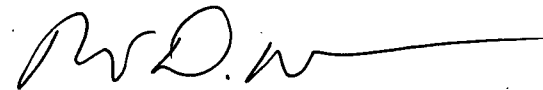
Appellant, by and through undersigned counsel, moves the Court for an Order allowing her to supplement/amend her Designation of Matter and supplement the Record on Appeal. The basis for this motion is set forth below.

Respondent Steiner's Designation of Matter requested that "Judge Milling Order (granting partial summary judgment to Dr. Steiner), July 2, 2008" be included in the Record on Appeal. In preparing the Record on Appeal, Appellant's Counsel inadvertently included a different Order of Judge Milling dated the following day, July 3, 2008. In order to avoid the cost, expense and delay of amending the Record on Appeal and removing Judge Milling's July 3, 2008 Order and replacing it with Judge Milling's July 2,

2008 Order, Appellant would move this Court for an Order allowing her amend her Designation of Matter to include Judge Milling's July 3, 2008 Order which was inadvertently included in the previously file Record on Appeal and then filing a Supplement Record on Appeal which would include Judge Milling's July 2, 2008 Order. In addition, Appellant would request leave from this Court to redact from the Record on Appeal the social security number and/or driver's license number of any deponent from the deposition transcripts that were included in the Record on Appeal.

Respectfully submitted,

April 29, 2015  
Columbia, South Carolina



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Case No. 2007-CP-32-01981

Martha Lewin Argoe,

Appellant.

v.

Three Rivers Behavioral  
Health, LLC; Phyllis Bryan-  
Mobley, MD; David A.  
Steiner, MD; Cheryl C.  
Dodds, MD; Doris Ann  
Burrell, RN

Respondent,

**PROOF OF SERVICE**

I certify that I have served the Motion to Supplement Designation of Matter and Supplement the Record on Appeal by depositing a copy of it in the United States Mail, postage prepaid, on April 29, 2015, addressed to their attorneys of record, listed below as:

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April 29, 2015

**VIA HAND DELIVERY**

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

**RE: Martha Lewin Argoe, Appellant v. Three Rivers Behavioral Health, LLC, et al., Respondents**  
**Case No. 2007-CP-32-01981**

Dear Ms. Kitchings:

I hope this letter finds you doing well. Enclosed please find the original and copy of the Motion to Supplement Designation of Matter and Supplement the Record on Appeal in the above referenced matter, along with our firm's check for \$25. Please file the original and return the clocked copy in the self-addressed, stamped envelope provided.

If you should need anything further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Tasha L. Smith".

Tasha L. Smith,  
Paralegal to Robert D. Dodson, Esquire

cc: William Davidson, Esquire  
Andrew Lindemann, Esquire  
Davidson & Lindemann, PA

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