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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED  
JUN 08 2015  
SC Court of Appeals

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

Michael Nettles, Circuit Court Judge

Case No. 2013-CP-21-00587

Genesie Fulton, individually and as Next Friend for  
Bryson F., a minor

Appellant,

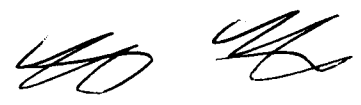
v.

L. William Goldstein, M.D., individually and  
d/b/a L. William Goldstein OB-GYN,

Respondents.

NOTICE OF APPEAL

Genesie Fulton, individually and as Next Friend of Bryson F., a minor, appeals the Order Denying Plaintiff's Motion for New Trial of the Honorable Michael Nettles dated May 19, 2015 and entered of record on May 19, 2015. Appellant received written notice of the Order on May 22, 2015.



Edward L. Graham  
Diane M. Rodriguez  
J. Layton Ruffin  
GRAHAM LAW FIRM, P.A.  
Post Office Box 550  
Florence, SC 29501  
t. (843) 662-3281  
f. (800) 859-7028

Attorneys for Appellant

June 8, 2015

**Other Counsel of Record:**  
Ellore A. Gaines  
Molly H. Craig  
HOOD LAW FIRM, LLC  
Post Office Box 1508  
Charleston, SC 29402

**Attorneys for Respondent**

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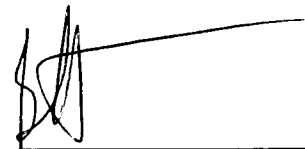
v.

L. William Goldstein, M.D., individually and  
d/b/a L. William Goldstein OB-GYN,

Respondents.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on L. William Goldstein, M.D. by depositing a copy of it in the United States Mail, postage prepaid, on June 8, 2015, addressed to his attorneys of record, Ellore A. Gaines and Molly H. Craig, Post Office Box 1508, Charleston, South Carolina 29402.



Brian Herbert, Ph.D.  
Paralegal  
Graham Law Firm  
Post Office Box 550  
Florence, SC 29501  
(843) 662-3281  
June 1, 2015

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# GRAHAM LAW

*Shining a Light on Safety. Guiding the Way to Justice.*

Edward L. Graham  
Diane M. Rodriguez, RN-JD  
J. Layton Ruffin

June 8, 2015

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JUN 08 2015

SC Court of Appeals

The Honorable Connie Reel-Shearin  
Clerk of Court for Florence County  
180 North Irby St.  
Florence, SC 29501

**RE: Genesie Fulton, individually and as Next Friend for Bryson F., a minor v. L. William Goldstein, M.D., individually and d/b/a L. William Goldstein OB-GYN**  
*Case No.: 2013-CP-21-00587*

Dear Ms. Reel-Shearin,

Enclosed for filing is a Notice of Appeal in the above referenced case. Please file the original and return a clocked copy by way of our courier.

With kindest personal regards, I am

Yours very truly,

Edward L. Graham  
Diane M. Rodriguez  
J. Layton Ruffin  
Post Office Box 550  
Florence, SC 29501  
t. (843) 662-3281  
f. (800) 859-7028  
Attorneys for Appellant

cc: Ellore A. Gaines, Esq.  
Molly H. Craig, Esq.  
Hood Law Firm, LLC  
P.O. Box 1508  
Charleston, SC 29402



Edward L. Graham  
Diane M. Rodriguez, RN-JD  
J. Layton Ruffin

June 8, 2015

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate St  
Columbia, SC 29201

**RECEIVED**  
JUN 06 2015  
SC Court of Appeals

**RE: Genesie Fulton, individually and as Next Friend for Bryson F., a minor v. L. William Goldstein, M.D., individually and d/b/a L. William Goldstein OB-GYN**  
**Case No.: 2013-CP-21-00587**

Dear Ms. Kitchings:

Please find enclosed for filing a Notice of Appeal in the above referenced case. Also enclosed are the following:

1. Proof of Service on Respondents.
2. A copy of the Order and Verdict to be challenged on appeal
3. A Copy of the letter requesting the transcript
4. A Copy of letter to the lower court; and
5. Our firms check for \$100.00 for the filing fee.

Please return a clocked copy to me via our courier.

With kindest personal regards, I am

Yours very truly,

Edward L. Graham  
Diane M. Rodriguez  
J. Layton Ruffin  
Post Office Box 550  
Florence, SC 29501  
t. (843) 662-3281  
f. (800) 859-7028  
Attorneys for Appellant

cc: Elloree A. Gaines  
Molly H. Craig