

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM LAURENS COUNTY

Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Trial Case No. 2011-CP-30-1137

Appellate Case No. 2014-002509

RECEIVED

JUL 06 2015

SC Court of Appeals

Pamela Neighbors and Carroll Neighbors.....Respondents

v.

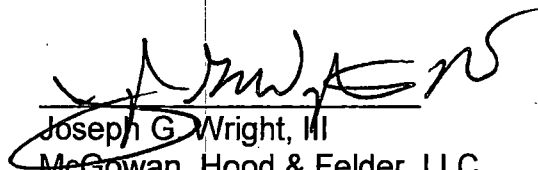
Byron A. Brown, MD and
Laurens County Obstetrics and Gynecology, LLCAppellants

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondents propose the following be included in the Record on Appeal:

1. Order of Honorable Frank R. Addy, Jr. entering Judgment dated October 17, 2014
2. Order of Honorable Frank R. Addy, Jr. dated December 31, 2012
3. Order of Honorable Frank R. Addy, Jr. dated September 6, 2013
4. Order of Honorable Frank R. Addy, Jr. dated November 17, 2013
5. Jury Verdict dated July 25, 2014
6. Complaint
7. Answer
8. Trial Exhibits 10, 17, and 18
9. Court's Exhibit ID Brown deposition, Exhibits 17, 18, 21, 22, 23, 36, 43, 47, 48, 49, 54, 55, 58, and 77
10. Transcript of Trial pp. 100-133, 192-219, 400-404, 413
11. Deposition of Byron A. Brown (Court's Exhibit ID)

I certify that this designation contains no matter which is irrelevant to this appeal.



Joseph G. Wright, III
McGowan, Hood & Felder, LLC
P.O. Drawer 1778
Anderson, South Carolina
864-225-6228

Attorney for Respondents

July 1, 2015

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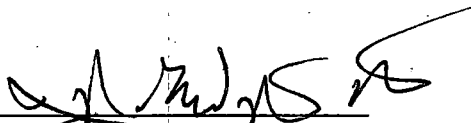
v.

Byron A. Brown, MD and
Laurens County Obstetrics and Gynecology, LLCAppellants

PROOF OF SERVICE

I certify that I have served the Designation of Matter to be Included in the Record on Appeal on Byron A. Brown, MD and Laurens County Obstetrics and Gynecology, LLC, a South Carolina Limited Liability Corporation by depositing a copy in the United States Mail, postage prepaid, on July 1, 2015, addressed to their attorney of record, Collie W. "Tripp" Lehn, Jr., Davis, Snyder & Williford, PA, #5 Hawthorne Park Court, Greenville, SC 29615.

July 1, 2015



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864-225-6228

Attorney for Respondents

McGowan, Hood & Felder, LLC

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July 1, 2015

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

Re: Pamela Neighbors v. Byron A. Brown, MD
Appellate Case No. 2014-002509

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Dear Madam Clerk:

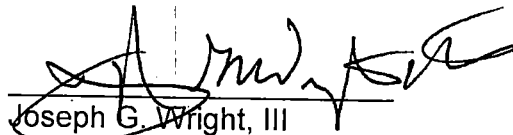
Enclosed for filing is the Initial Brief of Respondents with Proof of Service.

Also, enclosed for filing is the Designation of Matter to be Included in the Record on Appeal with Proof of Service.

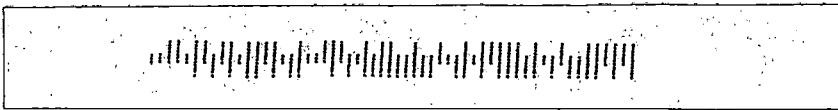
Thank you in advance for your cooperation.

Very truly yours,

McGowan, Hood & Felder, LLC


Joseph G. Wright, III

JGWIII/tda
Enclosures as Noted
Cc: Collie W. "Trip" Lehn, Jr., Esq.



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The Honorable Jenny Abbot Kitchings
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