

THE STATE OF SOUTH CAROLINA  
In the South Carolina Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

SEP 28 2015

The Honorable Deadra L. Jefferson  
The Honorable R. Markley Dennis, Jr.  
Charleston County

SC Court of Appeals

Trial Court Case No.: 2011-CP-10-08313  
2012-CP-10-02867

Appellate Case No.: 2015-001463

Clair Craver Johnson ..... Appellant

v.

John Roberts, M.D. .... Respondent

And

Clair Craver Johnson ..... Appellant

v.

Medical University of South Carolina ..... Respondent

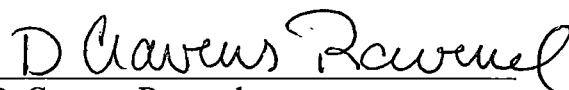
**DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD**

Appellant proposes the following be included in the Record on Appeal:

- (1) Complaint in Clair Craver Johnson v. John Roberts, M.D., 2012-CP-10-2687;
- (2) Answer in Clair Craver Johnson v. John Roberts, M.D., 2012-CP-2687;
- (3) Complaint in Clair Craver Johnson v. Medical University of South Carolina, 2011-CP-10-8318;

- (4) Answer in Clair Craver Johnson v. Medical University of South Carolina, 2011-CP-10-8318;
- (5) Order Consolidating; 2012-CP-10-2867 and 2011-CP-10-8318;
- (6) Respondent John Roberts, M.D.'s Motion for Summary Judgment;
- (7) Respondent Medical University of South Carolina's Motion for Summary Judgment;
- (8) Plaintiff's Memorandum in Opposition to Defendants' Motions for Summary Judgment;
- (9) Order Granting Summary Judgment in Favor of Defendants in Clair Craver Johnson v. John Roberts, M.D., 2012-CP-10-2867 and Clair Craver Johnson v. Medical University of South Carolina, 2011-CP-10-8318;
- (10) Notice of Motion to Alter or Amend and for Reconsideration Pursuant to Rule 59(e) S.C. Rules of Civil Procedure served on February 14, 2014 in Clair Craver Johnson v. John Roberts, M.D., 2012-CP-10-2867;
- (11) Order Denying Appellant's Motion for Reconsideration in Clair Craver Johnson v. Medical University of South Carolina, 2011-CP-10-8318;
- (12) Notice of Entry of Judgment Denying Plaintiff/Appellant's Rule 59(e) SCRCF, Motion for Reconsideration entered Pursuant to Rule 77 SCRCF on May 29, 2015 in Clair Craver Johnson v. Medical University of South Carolina;
- (13) Order Denying Appellant's Motion for Reconsideration in Clair Craver Johnson v. John Roberts, M.D., 2012-CP-10-2867;
- (14) Notice of Entry of Judgment Denying Plaintiff/Appellant's Rule 59(e), SCRCF Motion for Reconsideration entered Pursuant to Rule 77, SCRCF on May 29, 2015;
- (15) Affidavit of Harold J. Burstztajn, M.D. dated August 10, 2011.
- (16) Depositions of Harold J. Burstztajn, M.D. dated July 26, 2013 and October 29, 2013;
- (17) Notice of Intent to Appeal.

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



D. Cravens Ravenel  
BAKER, RAVENEL & BENDER, L.L.P.  
3710 Landmark Drive, Suite 400  
Post Office Box 8057  
Columbia, South Carolina 29202  
Phone: (803) 799-9091; Fax (803) 779-3423  
[cravenel@brblegal.com](mailto:cravenel@brblegal.com) File No.: 10517.2  
*Attorneys for Plaintiff*

September 28, 2015

COUNSEL OF RECORD:

James Edward Scott, IV, Esquire  
Donald Jay Davis, Jr., Esquire  
Stephen L. Brown, Esquire  
Russell G. Hines, Esquire  
Young Clement Rivers, LLP  
25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402  
Phone: (843) 720-5406  
[jdavis@ycrlaw.com](mailto:jdavis@ycrlaw.com); [jscott@ycrlaw.com](mailto:jscott@ycrlaw.com);  
[sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com); [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)  
*Attorneys for John Roberts, M.D.*

William Peele Early, Esquire  
Pierce Hems Sloan & McLeod, LLC  
P.O. Box 22437  
Charleston, SC 29413  
Phone (843) 722-7733; Fax: (843) 722-7732  
Email: [willearly@phsm.net](mailto:willearly@phsm.net)  
*Attorneys for The Medical University of South Carolina*

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**PROOF OF SERVICE**

I, D. Cravens Ravenel, an employee of Baker, Ravenel & Bender, L.L.P., attorneys for Appellant Clair Craver Johnson, hereby certify that I have, on this 28<sup>th</sup> day of September 2015, served counsel below with Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal by mailing copies of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel at the following addresses:

COUNSEL OF RECORD:

James Edward Scott, IV, Esquire  
Donald Jay Davis, Jr., Esquire  
Stephen L. Brown, Esquire  
Russell G. Hines, Esquire  
Young Clement Rivers, LLP  
25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402  
Phone: (843) 720-5406  
[jdavis@ycrlaw.com](mailto:jdavis@ycrlaw.com); [jscott@ycrlaw.com](mailto:jscott@ycrlaw.com);  
[sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com); [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)  
*Attorneys for John Roberts, M.D.*

William Peele Early, Esquire  
Pierce Hems Sloan & McLeod, LLC  
P.O. Box 22437  
Charleston, SC 29413  
Phone (843) 722-7733;  
Fax: (843) 722-7732  
Email: [willearly@phsm.net](mailto:willearly@phsm.net)  
*Attorneys for The Medical University of  
South Carolina*



D. Cravens Ravenel  
BAKER, RAVENEL & BENDER, L.L.P.  
3710 Landmark Drive, Suite 400  
Post Office Box 8057  
Columbia, South Carolina 29202  
Phone: (803) 799-9091; Fax (803) 779-3423  
[cravenel@brblegal.com](mailto:cravenel@brblegal.com) File No.: 10517.2  
*Attorneys for Plaintiff*



BAKER RAVENEL BENDER

ATTORNEYS AT LAW

D. Cravens Ravenel  
[cravenel@brblegal.com](mailto:cravenel@brblegal.com)  
(803) 343-3861- direct dial

September 28, 2015

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SC Court of Appeals

**HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: Clair Craver Johnson, Appellant v. John Roberts M.D., Respondent  
And  
Clair Craver Johnson, Appellant v. Medical University of South Carolina,  
Respondent  
Appellate Case No.: 2015-001463  
Our File No.: 10517.2

Dear Ms. Kitchings:

Enclosed for filing the above-referenced matter is an original and one (1) copy of my Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof. Please return a clocked copy of each document to me via the courier delivering same.

By copy hereof, I am serving same upon counsel for Respondents.

Thank you very much.

Sincerely,

D. Cravens Ravenel

DCR:sr

Enclosure

cc w/Encl.:

COUNSEL OF RECORD:

James Edward Scott, IV, Esquire

Donald Jay Davis, Jr., Esquire

Stephen L. Brown, Esquire

Russell G. Hines, Esquire

Young Clement Rivers, LLP

BAKER, RAVENEL & BENDER, L.L.P.  
[www.brblegal.com](http://www.brblegal.com)

mail. PO BOX 8057 | COLUMBIA, SC 29202  
shipping. 3710 LANDMARK DRIVE. suite 400 | COLUMBIA, SC 29204  
phone. 803.799.9091 | fax. 803.779.3423

25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402  
Phone: (843) 720-5406  
[jdavis@ycrlaw.com](mailto:jdavis@ycrlaw.com); [jscott@ycrlaw.com](mailto:jscott@ycrlaw.com);  
[sbrown@ycrlaw.com](mailto:sbrown@ycrlaw.com); [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)  
*Attorneys for John Roberts, M.D.*

William Peele Early, Esquire  
Pierce Hems Sloan & McLeod, LLC  
P.O. Box 22437  
Charleston, SC 29413  
Phone (843) 722-7733; Fax: (843) 722-7732  
Email: [willearly@phsm.net](mailto:willearly@phsm.net)  
*Attorneys for The Medical University of South Carolina*