

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge
R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2015-001463
Case No. 2012-CP-10-02867; 2011-CP-10-08318

RECEIVED
JAN 04 2016
SC Court of Appeals

Clair Craver Johnson,

Appellant,

v.

John Roberts, M.D.,

Respondent.

And

Clair Craver Johnson,

Appellant,

v.

Medical University of South Carolina,

Respondent.

**DESIGNATION OF MATTERS TO BE INCLUDED IN THE
RECORD ON APPEAL BY RESPONDENT JOHN ROBERTS, M.D.**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown
D. Jay Davis, Jr.
James E. Scott, IV
Russell G. Hines
25 Calhoun Street, Suite 400
Charleston, SC 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for John Roberts, M.D.

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS

Respondent John Roberts, M.D. proposes the following to be
included in the Record on Appeal:

Orders, Judgments, Decrees, or Decisions

1. Form 4 Order, filed January 16, 2014
2. Order Granting Summary Judgment, filed February 4, 2014
3. Order Denying Reconsideration (Dr. Roberts)
4. Order Denying Reconsideration (MUSC)

Pleadings

5. Complaint (MUSC)
6. Amended Complaint (Roberts)

Transcripts

7. Transcript of Hearing on January 9, 2014


Other materials or documents

8. Dr. Roberts's Motion for Summary Judgment
9. MUSC's Motion for Summary Judgment
10. MUSC's Memo in Support of Summary Judgment, including
all exhibits except duplicative material
11. Ms. Johnson's Memo in Opposition to Summary Judgment,
including all exhibits except duplicative material
12. Dr. Roberts's Memo in Support of Summary Judgment,
including all exhibits except duplicative material

I certify that this Designation of Matters contains no matter which is irrelevant to this appeal.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown

D. Jay Davis, Jr.

James E. Scott, IV

Russell G. Hines

25 Calhoun Street, Suite 400

Charleston, SC 29401

P.O. Box 993 (29402)

(843) 720-5488

Attorneys for John Roberts, M.D.

Charleston, South Carolina

Dated: 12/30/15

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge
R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2015-001463
Case No. 2012-CP-10-02867; 2011-CP-10-08318

RECEIVED
JAN 04 2016
SC Court of Appeals

Clair Craver Johnson,

Appellant,

v.

John Roberts, M.D.,

Respondent.

And

Clair Craver Johnson,

Appellant,

v.

Medical University of South Carolina,

Respondent.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown
D. Jay Davis, Jr.
James E. Scott, IV
Russell G. Hines
25 Calhoun Street, Suite 400
Charleston, SC 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for John Roberts, M.D.

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Respondent above named, do hereby certify that I have served the **INITIAL BRIEF OF RESPONDENT JOHN ROBERTS, M.D.** and the **DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL BY RESPONDENT JOHN ROBERTS, M.D.** on all parties of record by depositing a copy of the same in the United States Mail, postage prepaid, on December 30, 2015, addressed as follows to their counsel of record:

D. Cravens Ravenel, Esquire
Baker, Ravenel & Bender, L.L.P.
P.O. Box 8057
Columbia, SC 29202

Attorney for Clair Craver Johnson

-and-

William P. Early, Esquire
Pierce, Hems, Sloan & McLeod, LLC
P.O. Box 22437
Charleston, SC 29401

Attorney for Medical University of South Carolina

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

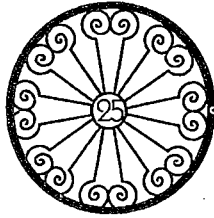
By: 

Russell G. Hines

Attorneys for John Roberts, M.D.

Charleston, South Carolina

Dated: 12/30/15



YCR LAW

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

50 YEARS

Russell G. Hines
Partner

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1327
E-mail: RHines@ycrlaw.com

December 30, 2015

RECEIVED

JAN 04 2016

SC Court of Appeals

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

Re: Clair Craver Johnson vs. John Roberts, M.D.
Clair Craver Johnson vs. Medical University of South Carolina
Appellate Case No. 2015-001463
Case No.: 2012-CP-10-2867
YCR File: 2466-20111027

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and one copy of the Initial Brief of Respondent John Roberts, M.D. and the Designation of Matters to be Included in the Record on Appeal by Respondent John Roberts, M.D. Also enclosed is the original and one copy of a proof of service regarding the same. Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Russell G. Hines
Partner

RGH/amj
Enclosures

cc: D. Cravens Ravenel, Esquire, Baker, Ravenel & Bender, L.L.P.
William P. Early, Esquire, Pierce, Hems, Sloan & McLeod, LLC



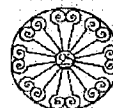
Hasler FIRST-CLASS MAIL
12/30/2015
US POSTAGE \$003.62⁰



ZIP 29401
011D12603180

FIRST CLASS MAIL

RECEIVED
JAN 04 2016
SC Court of Appeals



YCRLAW

25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402-0993

KBB
2466-
20111027

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