

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Daniel D. Hall., Circuit Court Judge

Appellate Case No. 2015-002653

RECEIVED

MAR 24 2016

SC Court of Appeals

Johnnie Mae Reed, as the Personal Representative of
The Estate of Sandra Gilbert,

Appellant,

vs.

CareNet, Inc. of Lancaster and Nimal A. Perera. M.D.

Respondents.

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

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

- (1) Complaint;
- (2) Affidavit of Service for Complaint;
- (3) Amended Complaint;
- (4) Affidavit of Service for Amended Complaint;
- (5) Death Certificate for Sandra Gilbert;
- (6) Answer to Complaint by Respondents CareNet and Perera;
- (7) Answer to Amended Complaint by Respondent CareNet;
- (8) Answer to Amended Complaint by Respondent Perera;
- (9) Order Denying Appellant's Motion for New Trial;
- (10) Appellant's Motion for New Trial;
- (11) Respondents' Memorandum in Opposition to Appellant's Motion for New Trial;
- (12) Rule 30(b)(6) Deposition Transcript of CareNet;
- (13) Respondents' Motion in Limine;
- (14) Appellant's Memorandum in Opposition to Respondents' Motion in Limine;
- (15) Portion of Trial Transcript Containing Arguments and Ruling on the Admissibility of Testimony regarding the Circumstances Surrounding Respondent Perera's Resignation from Respondent CareNet;

- (16) Portion of Trial Transcript Containing Testimony of Stewart Barre, Carol Rupe, and Mark Yoffe;
- (17) CareNet Medical Records for Trial (1-77).

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



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Attorney for the Appellant

March 24, 2016
Columbia, South Carolina

PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

Case No. 2013-CP-29-1339

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MAR 24 2016

SC Court of Appeals

Johnnie Mae Reed, as the Personal Representative of the Estate of Sandra Gilbert,
Appellant

vs.

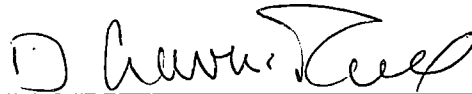
CareNet, Inc. of Lancaster and Nimal A. Perera, M.D., Respondents

PROOF OF SERVICE

I, D. Cravens Ravenel, an employee of Baker, Ravenel & Bender, L.L.P., Attorneys for Appellant Johnnie Mae Reed, as the Personal Representative of the Estate of Sandra Gilber, deceased, hereby certify that I have on this 24th day of March 2016, served counsel below with Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal by mailing a copy of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope to counsel at the following addresses:

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December 30, 2015

VIA HAND DELIVERY

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

RE: Johnnie Mae Reed, as the Personal Representative of the Estate of Sandra Gilbert, v. CareNet, Inc. of Lancaster and Nimal A. Perera, M.D.
Case No.: 2013-CP-29-1339
Our File No.: 10758.0

Dear Ms. Kitchings:

Enclosed herein please find the original and one (1) copy of Appellant's 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.: George C. Beighley, Esquire [E-Mail gbeighley@richardsonplowden.com](mailto:gbeighley@richardsonplowden.com) / US Mail
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