

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Marvin H. Dukes, III, Master In Equity

Case No. 2014-CP-07-2779
Appellate Case No. 2015-002363

RECEIVED
MAR 25 2016
SC Court of Appeals

Mary Beth Marzulli, Respondent,

v.

Tenet South Carolina, Inc., Hilton Head Health System,
LP d/b/a Hilton Head Regional Medical Center, and
Tenet Physician Services-Hilton Head, Inc., Appellants.

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

Pursuant to Rule 209, SCACR, Mary Beth Marzulli ("Respondent") designates the following material for inclusion in the record on appeal:

1. Complaint – Filed October 30, 2014
2. Order of The Honorable Marvin H. Dukes, III – Filed October 23, 2015
3. Affidavit of Mary Beth Marzulli – Dated April 8, 2015
4. Affidavit of Darlene Nester with Exhibit – Dated December 3, 2014
5. Second Affidavit of Mary Beth Marzulli – Dated April 24, 2015
6. Third Affidavit of Mary Beth Marzulli with Exhibits – Dated May 15, 2015
 - a. Exhibit J – Receipt for Seminar Package Purchased dated March 23, 2014
 - b. Exhibit K – Letter from Darlene Nester dated July 30, 2014

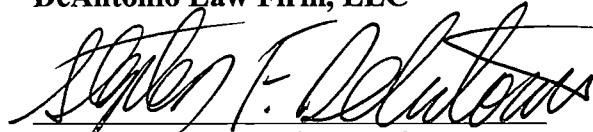
- c. Exhibit L – Email string regarding reimbursement for Seminar in March dated September 27, 2014 to October 2, 2014
7. Defendant’s Supplemental Memorandum in Support of Motion to Compel Arbitration and to Dismiss or Stay with Exhibits – Dated April 26, 2015
 - a. Affidavit of John Ross – Dated April 23, 2015
 - b. Second Affidavit of Ruth Hyde Pelletier – Dated April 23, 2015
 - c. Affidavit of MaryAlice Meyer – Dated April 24, 2015
 - d. Affidavit of Cassie Ball – Dated April 23, 2015
8. Affidavit of Ruth Hyde – Dated December 3, 2014
9. Affidavit of Anita “Gay” Propst – Dated December 3, 2014
10. Affidavit of Beth Gasiorowski – Dated December 3, 2014
11. Acknowledgement – Dated October 10, 2011
12. Beaufort County Sheriff’s Office Original Police Report – Dated May 13, 2014
13. Transcript of Hearing – April 15, 2015
14. Transcript of Beaufort County Sheriff’s Office 911 Call of May 13, 2014
15. Supplemental Police Report
16. Plaintiff’s Memorandum in Opposition to Motion to Compel Arbitration with Exhibits dated April 8, 2015, filed April 13, 2015
17. Plaintiff’s Supplemental Memorandum in Opposition to Motion to Compel Arbitration with Exhibits dated April 27, 2015, filed April 28, 2015
18. Statement to Police by Marzulli

The undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to the appeal.

*[Remainder of Page Intentionally Left Blank
Signatures Appear on Page 3]*

Charleston, South Carolina
March 18, 2016

DeAntonio Law Firm, LLC



Stephen F. DeAntonio, Esquire
SC Bar No.: 10445
E-Mail: sdeantonio@deanlawfirm.com
Post Office Box 30069
Charleston, SC 29417
P: (843) 577-8080
F: (843) 577-4188

Finger Melnick & Brooks, P.A.

Benjamin T. Shelton, Esquire
SC Bar No.: 77207
E-Mail: Bshelton@fingerlaw.com
35 Hospital Center Common Suite 200
Hilton Head, SC 29926
P: (843) 681-7000
F: (843) 681-8802

Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Marvin H. Dukes, III, Master In Equity

Case No. 2014-CP-07-2779
Appellate Case No. 2015-002363

RECEIVED
MAR 25 2016
SC Court of Appeals

Mary Beth Marzulli, Respondent,

v.

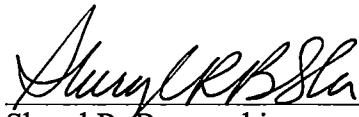
Tenet South Carolina, Inc., Hilton Head Health System,
LP d/b/a Hilton Head Regional Medical Center, and
Tenet Physician Services-Hilton Head, Inc., Appellants.

PROOF OF SERVICE

I, the undersigned Legal Assistant of the law office of DeAntonio Law Firm, LLC, attorneys for the Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: Respondent's Designation of Matter to be Included in the Record on Appeal

Counsel Served: A. Mattison Bogan, Esquire
E-Mail: matt.bogan@nelsonmullins.com
Sue Erwin Harper, Esquire
E-Mail: corky.harper@nelsonmullins.com
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 11070
Columbia, SC 29211-1070



Sheryl R. Beczynski
Legal Assistant to Stephen F. DeAntonio

March 18, 2016

DEANTONIO LAW FIRM, LLC
POST OFFICE BOX 30069
CHARLESTON, SOUTH CAROLINA 29417

STEPHEN F. DEANTONIO
sdeantonio@deanlawfirm.com

www.deanlawfirm.com

TELEPHONE: (843) 577-8080
FACSIMILE: (843) 577-4188

March 18, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
PO Box 11629
Columbia, South Carolina 29201

RECEIVED

MAR 25 2016

SC Court of Appeals

Re: *Mary Beth Marzulli v. Tenet South Carolina, Inc., et al.*
Case No.: 2014-CP-07-2779
Appellate Case No.: 2015-002363
Our File No.: 14-020

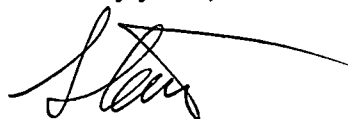
Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy each of the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal and Proofs of Service for the filings. We ask that you file the originals and return "Filed" stamped copies to us in the stamped, pre-addressed envelope enclosed for your convenience.

By copy of this letter to counsel of record, we are serving them with copies of this Brief and Designation.

With kind regards, I am

Sincerely yours,



Stephen F. DeAntonio

SFD/srb

Enclosures

cc: Sue Erwin Harper, Esquire
A. Mattison Bogan, Esquire
Benjamin T. Shelton, Esquire