

COX FERGUSON AND WHAM, LLC

ATTORNEYS AT LAW
107 E. Laurens St.
P.O. Box 286.
LAURENS, SOUTH CAROLINA 29360-0286

W. REID COX, JR.
JOHN R. FERGUSON
ALLEN M. WHAM

PHONE: (864) 984-2126
FAX: (864) 984-7372
E-MAIL: jferg@backroads.net

April 15, 2016

Office of the Clerk of Court
S.C. Supreme Court
P.O. Box 11330
Columbia, SC 29211

RECEIVED
APR 19 2016
SC SUPREME COURT

Re: Mangal v. State, 2016-000610

Dear Ladies:

Enclosed with this letter you will find for filing an original and six copies of the Respondent's Reply to Petition for Writ of Certiorari. I have also enclosed the original and a copy of the Certificate of Service on opposing counsel. Please file the original and send me a clocked copy of that document in the enclosed envelope. Thank you for your help.

I had previously raised a concern about the completeness of the record before the Court. To avoid further delay and its attendant prejudice to my client, I have attached a copy of the necessary transcript page plus the next page (which is already in the record) to my return. I am asking the Court to accept this attachment in lieu of further consideration of the gap in the record.

Sincerely,

John R. Ferguson
John R. Ferguson

JRF/wp
Encl.
CC: Alicia A. Olive, Esq.

Doctor Medlock - Direct examination
by Mr. Crane

1 that?

2 A I do not think so.

3 Q All right. Let me ask you a question.

4 Doctor Medlock, we have placed in the record OB-GYN
5 records of Mena Farid and I will show you a record here
6 which is dated January 2nd, '02, and I understand that's
7 not your record. That record was made by Doctor Franks, who
8 we have learned is no longer employed there.

9 Do you see down on the left-hand side of that page
10 where it says, according to the records, that the hymen was
11 in tact?

12 A Yes, sir.

13 Q Okay. Can you tell us what that means, sir?

14 A Well, the hymen is a, is a membrane that remains in
15 tact until a person becomes sexually active and somehow
16 perforates. It's a delicate membrane. It's easily, in most
17 cases, it's easily perforated and torn.

18 Q All right. How long have you been practicing medicine,
19 sir?

20 A Since '59.

21 Q All right. Almost 50 years?

22 A Almost.

23 Q Okay. Are you indicating then that if a individual is
24 sexually active or has engaged in sexual activity the hymen
25 will not be in tact?

Doctor Medlock - Direct examination
by Mr. Crane

1 A You, you would expect it not be in tact.

2 Q So, if it is in tact, then you're testifying that it
3 would indicate there's not been sexual activity, is that
4 correct?

5 A That would be my interpretation, yes, sir.

6 Q Have you had an occasion to inquire about and do
7 research on what a crescentic hymen is?

8 A Had to look it up.

9 Q All right.

10 A Because I wasn't familiar.

11 Q What did you look it up in?

12 A In a medical dictionary.

13 Q And what is a crescentic hymen?

14 A A crescentic hymen, a thin crescentic or angular
15 membrane or fold partly occluding the vaginal external
16 orifice in the virgin.

17 Q In the virgin?

18 A That's, that's the definition in the dictionary.

19 Q And virgin would mean no sexual intercourse?

20 A That's the way I would interpret it.

21 Q All right. And again, looking back at the OB-GYN
22 record, what is the date at the top, sir?

23 A Let's see. It's January 2nd, '02.

24 Q Okay. One moment please, doctor. Let me check over
25 here. Thank you, sir.