

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM HAMPTON COUNTY  
Court of Common Pleas

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RECEIVED

MAY 09 2016

Judge Perry M. Buckner, III, Circuit Court Judge

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CC Court of Appeals

Appellate Case No. 2016-000222

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Angel Y. Gary as Personal Representative of the Estate of  
Blondell M. Gary, .....Respondent,

v.

Lowcountry Medical Transport, Inc. American Medical Response, Inc.,  
d/b/a Access2care, and Eugene A. Kirkland, In re: Charles Gary, Purported  
Surviving Spouse, Defendants,  
Of Whom Charles Gary, Purported Surviving Spouse, is .....Appellant.

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

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

1. Motion to Amend Complaint, filed on December 29, 2015.
2. Motion to Amend Declaratory Judgment Complaint, filed on December 29, 2015.
3. Final Divorce Order and Decree, filed on January 22, 2001.
4. Marriage Certificate between Charles Gary and Blondell Gary, signed on November 30, 1999.
5. Transcript from Trial Court Hearing, commenced on January 12, 2016.
6. Petition for Removal of Personal Representative, filed on March 17, 2015.

7. Answer to Petition for Removal of Personal Representative, filed on April 20, 2015.
8. Order Approving Wrongful Death and Survival Action Settlement, filed on September 15, 2015.
9. Order of Dismissal, filed November 30, 2015.
10. Certificate of Appointment as Personal Representative, filed February 15, 2012.
11. Supplement to Application for Appointment of Personal Representative, filed on December 14, 2015.

a. Including all exhibits.

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

May 4, 2016

Respectfully submitted,

BY: 

Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A.

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ATTORNEYS FOR RESPONDENT

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Of Whom Charles Gary, Purported Surviving Spouse, is.....Appellant.

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**PROOF OF SERVICE**

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This is to certify that I, Austin H. Crosby, with the law office of Peters, Murdaugh, Parker, Eltzroth and Detrick, PA, Attorney for the Respondent, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within **Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal** to:

Joseph Dawson, III , Esquire  
Post Office Box 41367  
N. Charleston, SC 29423-1367  
*Attorney for Petitioner, Charles Gary*

BY: \_\_\_\_\_



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May 4, 2016

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MAY 09 2016

**SC Court of Appeals**

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

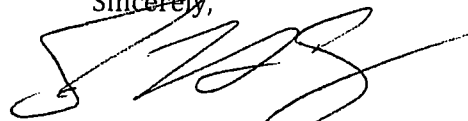
**Re: Angel Y. Gary as PR for Blondell Marie Gary v. Lowcountry Medical Transport, Inc.,  
American Medical Response, Inc., d/b/a, Access2Care, and Eugene A. Kirkland  
Appellate Case No.: 2016-000222**

Dear Ms. Kitchings:

Enclosed please find Respondent's Initial Brief to the Court regarding the above-referenced appeal.

With kind regards, I am

Sincerely,



Austin H. Crosby

AHC/abg  
Enclosures