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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APR 29 2016

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Michael Nettles, Circuit Court Judge

Appellate Case No. 2015-001237

Genesie Fulton, individually and as Next  
Friend for Bryson F., a minor,

Appellants,

v

v.

L. William Goldstein, M.D., individually  
and d/b/a L. William Goldstein OB-GYN,

Respondents.

**MOTION TO FILE AND SERVE A SUPPLEMENTAL RECORD ON APPEAL**

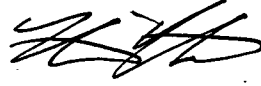
Appellants, by and through the undersigned, move to supplement the Record on Appeal, pursuant to Rule 212, SCACR, to include the May 4-8, 2015 trial transcript cross-examination testimony of Brittany Prince, pg. 45 lines 4-6.

Appellants have prepared the Supplemental Record on Appeal to include this transcript page.

Appellants have consulted with counsel for the Respondents who consent to this supplementation.

[Attorney's closing on following page.]

Respectfully submitted,



Edward L. Graham  
Diane M. Rodriguez  
J. Layton Ruffin  
GRAHAM LAW FIRM  
Post Office Box 550  
Florence, SC 29503  
*Attorneys for Appellant*

April 26, 2016

THE STATE OF SOUTH CAROLINA  
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Court of Common Pleas

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Michael Nettles, Circuit Court Judge

Appellate Case No. 2015-001237

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Friend for Bryson F., a minor

Appellant,

v. v.

L. William Goldstein, M.D., individually  
and d/b/a L. William Goldstein OB-GYN,

Respondents.

**PROOF OF SERVICE**

I hereby certify that one copy of the **Motion to File and Serve a Supplemental Record on Appeal** and the **Supplemental Record on Appeal** in the above-captioned matter was served by U.S. Mail, postage prepaid, on April 27, 2016 addressed to the following counsel of record:

ELLOREE A. GAINES ESQ  
MOLLY H. CRAIG ESQ  
HOOD LAW FIRM, LLC  
POST OFFICE BOX 1508  
CHARLESTON, SC 29402

**GRAHAM LAW FIRM, P.A.**

By: 

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*Attorneys for Appellants*



# GRAHAM LAW

*Shining a Light on Safety, Guiding the Way to Justice.*

Edward L. Graham  
Diane M. Rodriguez  
J. Layton Ruffin

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APR 29 2016

**SC Court of Appeals**

April 27, 2016

THE HONORABLE JENNY ABBOTT KITCHINGS  
CLERK, SOUTH CAROLINA COURT OF APPEALS  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201

Re: *Genesie Fulton, individually and as Next Friend of Bryson F., a minor, Appellants v. L. William Goldstein, M.D., individually and d/b/a L. William Goldstein OB-GYN, Respondents.*  
Appellate Case No. 2015-001237

Dear Ms. Kitchings:

Enclosed please find the original (unbound) and seven (7) copies of the Motion to File and Serve a Supplemental Record on Appeal, along with a proof of service. Also, enclosed please find the original (unbound) and sixteen (16) copies of the Supplemental Record on Appeal along with the original and one copy of the proof of service. Please file the originals and return filed stamped copies to me in the envelope enclosed for your convenience. Enclosed is a check in the amount of \$25.00 for the filing fee for this Motion.

By copy of this letter, I am serving opposing counsel with same.

With kindest personal regards, I am.

Very truly yours,

J. Layton Ruffin

JLR/ddb

Enclosure

cc: ELLOREE A GAINES ESQ  
MOLLY H CRAIG

**GRAHAM LAW FIRM, P.A.**

383 West Cheves Street, Florence, SC 29501

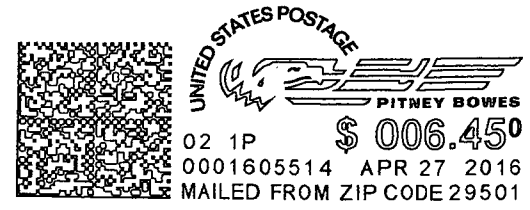
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SC Court of Appeals

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