

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

RECEIVED
OCT 11 2016
SC Court of Appeals

Case No. 2016-001525

Alliance Biomedical Research, LLC,

Appellant,

v.

Judith H. Parham, Personal Representative
of the Estate of David Michael Parham,
deceased and Parham & Smith, LLC,

Respondents.

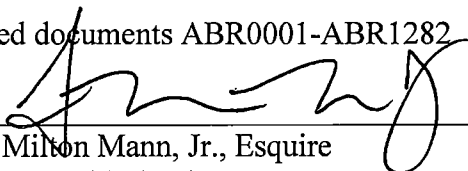
APPELLANT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

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

1. Complaint in *John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, filed in the Court of Common Pleas for Greenville County, Thirteenth Judicial Circuit, case number 2011-CP-23-6967, on October 20, 2011.
2. Defendant, Alliance Biomedical Research, LLC's Motion to Dismiss Plaintiffs' Complaint as to Defendant Alliance Biomedical Research, LLC in *John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, case number 2011-CP-23-6967, clocked November 17, 2011
3. Defendant, Alliance Biomedical Research, LLC's Answer to Plaintiff's Interrogatories in *John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, case number 2011-CP-23-6967, dated November 10, 2011
4. Defendant, Alliance Biomedical Research, LLC's Answer to Plaintiff's Request for Production in *John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, case number 2011-CP-23-6967, dated November 10, 2011

5. Defendant, Alliance Biomedical Research, LLC's Answer to Plaintiff's Complaint in *John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, case number 2011-CP-23-6967, clocked November 23, 2011
6. Deposition transcript of Steven Clemons taken on March 20, 2012, in *John L. Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, case number 2011-CP-23-6967
7. Letter from Michael Parham, Esq., to Ashby Davis, Esq., dated April 16, 2012 in *John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, case number 2011-CP-23-6967
8. Deposition of John Bruce in *John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group*, case number 2011-CP-23-6967, taken on April 16, 2012
9. Stipulation of Dismissal of Appellant with Prejudice entered on May 4, 2012
10. Order by the Honorable Steven H. John dated October 15, 2014
11. Appellant's Second Amended Complaint filed on November 3, 2014
12. Respondents' Answer to Appellant's Second Amended Complaint served on December 19, 2014 Appellant's Responses to Respondents' Second Requests for Production
13. Appellant's Responses to Interrogatories dated April 17, 2015
14. Appellant's Responses to Request for Production dated April 17, 2015
15. Deposition transcript of Gregory J. Feldman, M.D., taken on December 16, 2015
16. Appellant's Responses to Respondents' Requests for Admission dated February 17, 2016
17. Respondents' Motion for Summary Judgment served on February 11, 2016
18. Appellant's Amended Responses to Respondents' Requests for Production dated March 9, 2016
19. Appellant's Second Amended Responses to Respondents' Requests for Production dated March 17, 2016
20. Appellant's Second Amended Responses to Respondents' Interrogatories dated March 17, 2016
21. Respondents' Memorandum in Support of Motion for Summary Judgment served on March 29, 2016
22. Appellant's Memorandum in Opposition to Respondents' Motion for Summary Judgment served on April 8, 2016
23. Affidavit of Gregory J. Feldman, M.D., dated April 7, 2016
24. Affidavit of Holly Jo Mann served on April 7, 2016
25. Respondents' Reply to Appellant's Memorandum in Opposition to Respondents' Motion for Summary Judgment
26. Order by the Honorable Perry H. Gravely granting Respondents' Motion for Summary Judgment entered June 29, 2016
27. Disc containing Appellant's bate-stamped documents ABR0001-ABR1282

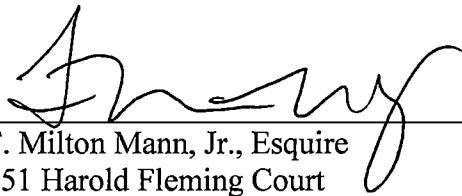
October 7, 2016


 F. Milton Mann, Jr., Esquire
 151 Harold Fleming Court
 Spartanburg, SC 29303
 (864) 680-5079
 Attorney for Appellant

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

Respectfully submitted,

October 7, 2016



F. Milton Mann, Jr., Esquire
151 Harold Fleming Court
Spartanburg, SC 29303
(864) 680-5079
Attorney for the Appellant

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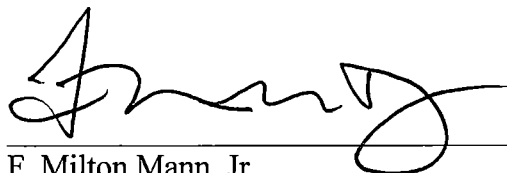
Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Initial Brief, Appellant's Designation of Matter to be Included in the Record on Appeal, and Proof of Service, upon Respondents Judith H. Parham, Personal Representative of the Estate of David Michael Parham, deceased and Parham & Smith, LLC by email and depositing copies in the United States Mail, postage pre-paid; South Carolina Court of Appeals Clerk of Court, The Honorable Jenny Abbott Kitchings; by depositing copies in the United States Mail, postage pre-paid, on October 7, 2016, at the addresses listed below:

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Clerk of Court
1220 Senate Street
Columbia, SC 29202

Jeffrey M. Bogdan, Esquire
Barnwell Whaley Patterson & Helms, LLC
P.O. Drawer H
Charleston, SC 29402
Phone: (843) 577-7700
Attorney for Respondents



F. Milton Mann, Jr.
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Attorney for Appellant

October 7, 2016

F. MILTON MANN, JR.

ATTORNEY AT LAW
LICENSED IN SC, GA & FL

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Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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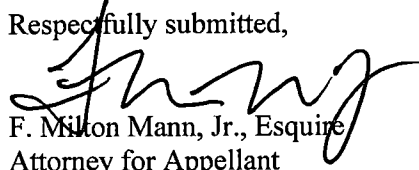
Re: Alliance Biomedical Research, LLC, Appellant,
v. Judith H. Parham, Personal Representative of the Estate of
David Michael Parham, deceased and Parham & Smith, LLC
Respondents – Appellate Case No. 2016-001525

Dear Ms. Kitchings:

Enclosed please find one (1) each original and copy of Appellant's Initial Brief, Appellant's Designation of Matter to be Included in the Record on Appeal, and Service of Process in the above-referenced case. Please file the original with the case file and return the copy in the enclosed, pre-paid envelope.

Thank you in advance for your assistance in this matter.

Respectfully submitted,



F. Milton Mann, Jr., Esquire
Attorney for Appellant
SC Bar #68250

cc: Jeffrey Michael Bogdan (by email and U.S. Mail)

PRIORITY MAIL

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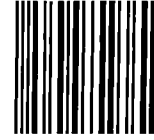
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F. MILTON MANN, JR., ESQ.
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Spartanburg, SC 29303

JENNY ABBOTT KITCHINGS
CLERK OF COURT
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET
COLUMBIA, SC ~~29202~~

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