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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM PICKENS COUNTY
In The Court of Common Pleas

Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2016-001525

Trial Court Case No. 2014-CP-39-350

Alliance Biomedical Research, LLC Appellant,

v.

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

RESPONDENTS' DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD

M. Dawes Cooke, Esq.
Jeffrey M. Bogdan, Esq.
Barnwell Whaley Patterson & Helms, LLC
P. O. Drawer H
Charleston, SC 29402
(843) 577-7700
Attorneys for Respondent

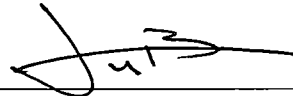
November 7, 2016
Charleston, South Carolina

Other Counsel of Record:
F. Milton Mann, Jr.
151 Harold Fleming Court
Spartanburg, SC 29303
(864) 680-5079
Attorney for Appellant

In accordance with the SCRAP, Rule 209, Respondent proposes that 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, 2011-CP-23-6967 filed October 20, 2011
2. Stipulation of Dismissal as to Alliance Biomedical Group in John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group, 2011-CP-23-6967 filed April 19, 2012.
3. Release in John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group, 2011-CP-23-6967 dated October 1, 2012.
4. Appellant's Second Amended Complaint filed November 3, 2014
5. Amended Consent Scheduling Order filed December 18, 2015
6. Defendants' Motion for Summary Judgment filed February 16, 2016
7. Defendants' Memorandum in Support of Motion for Summary Judgment filed March 31, 2016
8. Order Granting Defendants' Motion for Summary Judgment filed June 29, 2016
9. Plaintiff's amended Responses to Interrogatories dated March 17, 2016
10. Plaintiff's Second Amended Responses to Request for Production dated March 17, 2016
11. Deposition Transcript of Gregory J. Feldman, M.D., taken on December 16, 2015
12. Plaintiff's Responses to Requests for Admission dated February 17, 2016
13. Plaintiff's Responses to Defendants' Second Interrogatories dated March 17, 2016
14. Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment signed April 8, 2016

15. Deposition Transcript of John L Bruce taken on April 16, 2012 in John L. Bruce and Marilyn Bruce v. Greenville Pharmaceutical Research, Inc. and Alliance Biomedical Group, 2011-CP-23-6967
16. Transcript of Hearing before the Honorable Perry H. Gravely on June 6, 2016
17. Email from Milton Mann to Greg Feldman, MD sent March 19, 2012.
18. Defendant's Reply to Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment filed June 2, 2016
19. Plaintiff's Notice of Appeal



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Dated: November 7, 2016
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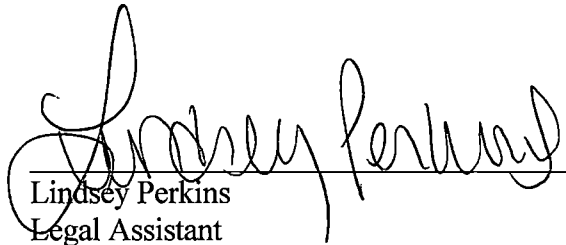
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PROOF OF SERVICE

I certify that I have served the Respondents' Designation of Matter for Inclusion in the Record on Appellant Alliance Biomedical Research, LLC by depositing a copy of it in the United States Mail, postage prepaid, on November 7, 2016, addressed to its counsel of record F. Milton Mann, Jr., Esquire at address 151 Harold Fleming Court, Spartanburg, SC 29303.


Lindsey Perkins
Legal Assistant



Jeffrey M. Bogdan, Esquire
jbogdan@barnwell-whaley.com

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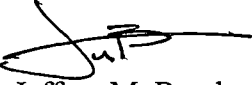
SC Court of Appeals

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

RE: Alliance Biomedical Research, LLC vs. Judith H. Parham, Personal Representative of the Estate of David Michael Parham, deceased and Parham & Smith, LLC
Appellate Case No.: 2016-001525
Trial Court Case No.: 2014-CP-39-350
BWPH File No.: 59.020

Dear Ms. Kitchings,

Enclosed please find an original and one copy of the Initial Brief of Respondents and Designation of Matter for Inclusion in the Record with regard to the above referenced matter. Upon filing the original, please return the clocked copy to me in the envelope enclosed for your convenience. By copy of this letter, I am serving these documents on all counsel of record. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

Jeffrey M. Bogdan

JMB/lap
Enclosures

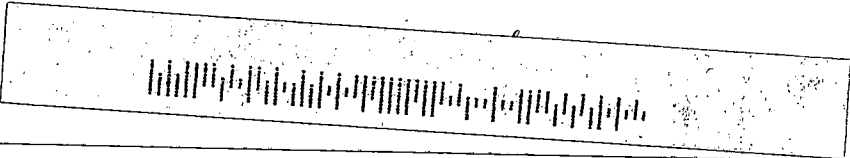
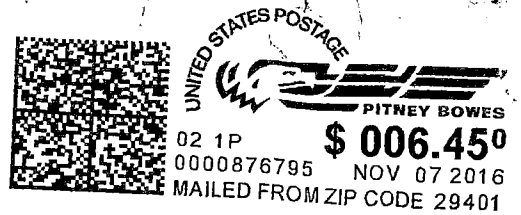
cc: F. Milton Mann, Jr., Esquire (via email and US mail w/enclosures)

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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE



**BARNWELL
WHALEY**
PATTERSON & HELMS LLC

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1938-2013

P.O. Drawer H, Charleston, SC 29402-0197

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