

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
The Court of Common Pleas for the Ninth Judicial Circuit

RECEIVED

Hon. J. C. Nicholson, Jr., Circuit Court Judge

APR 25 2017

SC Court of Appeals

Appellate Case No. 2016-002326

Shon Turner, as Personal Representative
of the Estate of Charles Mikell, deceased, Respondent/Appellant

v.

The Medical University of South Carolina Appellant/Respondent

**RESPONDENT/APPELLANT SHON TURNER'S DESIGNATION
OF MATTER TO BE INCLUDED IN RECORD ON APPEAL**

Robert B. Ransom
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ATTORNEYS FOR THE
RESPONDENT/APPELLANT
SHON TURNER

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ATTORNEYS FOR THE
APPELLANT/RESPONDENT
MEDICAL UNIVERSITY OF
SOUTH CAROLINA

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Respondent/Appellant Shon Turner proposes the following be included in the Record on Appeal:

1. September 28, 2016 Order for Sanctions
2. December 9, 2015 Notice of Entry of Judgment Order denying MUSC's motion for partial summary judgment
3. August 4, 2015 Fifth Amended Consent Scheduling Order
4. March 6, 2015 Order of Judge Stilwell
5. December 15, 2014 Order of Judge Dennis
6. May 15, 2014 Order of Judge Nicholson
7. March 9, 2016 Answer to Second Amended Complaint
8. February 22, 2016 Second Amended Complaint
9. Plaintiff's Reply Memorandum on Issue of Attorneys Fees
10. Supplemental Memorandum in Opposition to Plaintiff's Motion for Discovery Sanctions with Exhibits A - D
11. Supplemental Memorandum in Support of Plaintiff's Motion for Discovery Sanctions with Exhibits A - CC
12. Plaintiff's Motion for Discovery Sanctions
13. April 1, 2016 Email from Ms. Burroughs to Mr. Ransom
14. April 1, 2016 Email to Ms. Burroughs from Mr. Ransom
15. April 1, 2016 Email from Ms. Burroughs to counsel
16. March 28, 2016 letter to Judge Nicholson from Mr. Ransom
17. March 18, 2016 letter to Judge Nicholson from Mr. Cooke
18. March 18, 2016 Email from Ms. Burroughs to counsel
19. March 17, 2016 Email to Ms. Burroughs from Mr. Ransom
20. March 17, 2016 Email to Ms. Burroughs from Mr. Cooke
21. March 17, 2016 Email to Ms. Burroughs from Ms. Fleming

22. March 17, 2016 Email from Ms. Burroughs to Mr. Ransom
23. March 17, 2016 Email from Ms. Burroughs to counsel
24. March 8, 2016 Email to Ms. Burroughs from Mr. Ransom
25. March 8, 2016 Email from Ms. Burroughs to Mr. Ransom
26. March 3, 2016 Email to Ms. Burroughs from Mr. Ransom
27. March 1, 2016 Affidavit of Alissa Fleming, Esq.
28. February 24, 2016 letter to Judge Nicholson from Mr. Ransom with Exhibits
29. February 22, 2016 Plaintiff's Motion to Seal
30. Confidential Information to Be Submitted to Court in Connection with Plaintiff's Motion to Seal and unredacted Declaration of Robert B. Ransom
31. January 26, 2016 Email from Ms. Burroughs with questions to be answered by counsel
32. January 4, 2016 letter to Judge Nicholson from Mr. Ransom
33. Third Supplemental Affidavit of Robert B. Ransom
34. Second Supplemental Affidavit of Robert B. Ransom
35. Supplemental Affidavit of Robert B. Ransom
36. Affidavit of Robert B. Ransom
37. Affidavit of Alex Apostolou
38. October 21, 2015 Hearing Transcript
39. December 11, 2015 Hearing Transcript
40. July 18, 2016 Hearing Transcript
41. Trial Testimony of Donna Embry (Trial Transcript pages 502 to 663)
42. Trial Testimony of George Guldan, MD (Trial Transcript pages 170 to 194 and 211 to 222)
43. Trial Testimony of Sheila Scarborough (Trial Transcript pages 224 to 238 and 245 to 261)
44. Trial Transcript page 784

45. Plaintiff's Response to Defendant's Motion for Partial Summary Judgement with Exhibit E (June 15, 2015 Deposition of Dr. Berry)
46. Plaintiff's Trial Exhibit 16
47. Plaintiff's Trial Exhibit 14
48. Plaintiff's Trial Exhibit 11
49. Plaintiff's Trial Exhibit 10
50. Plaintiff's Trial Exhibit 9
51. Plaintiff's Trial Exhibit 6
52. Plaintiff's Trial Exhibit 5
53. Plaintiff's Trial Exhibit 3
54. Plaintiff's Trial Exhibit 2
55. Defendant's Response to Plaintiff's Second Discovery Request
56. Defendant's Amended Response to Plaintiff's Third Request for Admissions
57. Defendant's Amended Response to Plaintiff's Second Request for Admissions

Respectfully submitted

By: 

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PROOF OF SERVICE

I certify that I have served the Respondent/Appellant Shon Turner's Designation of Matter to Be Included in the Record on Appeal on The Medical University of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on April 21, 2017, addressed to its attorney of record, M. Dawes Cooke, Jr.,

April 21, 2017

By:

Robert B. Ransom

Robert B. Ransom

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Attorney for the Appellant

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April 21, 2017

Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Shon Turner v. MUSC
Appellate Case No. 2016-002326

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Dear Ms. Kitchings:

Enclosed please find one copy of the Initial Brief of Respondent/Appellant Shon Turner along with a Proof of Service.

Also enclosed please find one copy of the Respondent/Appellant Shon Turner's Designation of Matter to Be Included in the Record on Appeal along with a Proof of Service.

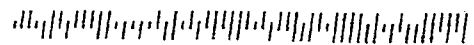
Thank you for your attention to this matter. Please call me if you have any questions or comments.

Very truly yours,

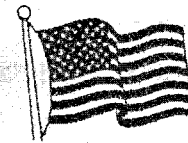


Robert B. Ransom

c: M. Dawes Cooke, Jr., Esq.
Alex Apostolou, Esq.



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