

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

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

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Appellate Case No. 2016-001986

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RECEIVED

MAY 16 2017

SC Court of Appeals

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

v.

The Medical University of South Carolina ..... Respondent

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

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ATTORNEYS FOR THE  
RESPONDENT  
MEDICAL UNIVERSITY OF  
SOUTH CAROLINA

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

1. Plaintiff's Second Amended Complaint
2. MUSC's Answer to Second Amended Complaint
3. MUSC's Answers to Plaintiff's First Discovery Requests (served May 17, 2013)
4. MUSC's Supplemental Answers to Plaintiff's First Discovery Requests (served Feb 6, 2015)
5. Plaintiff's Pretrial Brief
6. Plaintiff's Trial Exhibits Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 19, 45(h), 46
7. Defendant's Trial Exhibit No. 8
8. Proposed verdict forms
9. Form 4 Judgment in a Civil Case - Jury Verdict in Favor of Defendant
10. Notice of Entry of Judgment/Order Pursuant to Rule 77, SCRCP
11. Plaintiff's Motion for New Trial
12. MUSC's Memorandum in Opposition to Plaintiff's Motion for a New Trial
13. Plaintiff's Reply Memorandum on Motion for New Trial
14. Order Denying Motion for New Trial

Respectfully submitted

By: 

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**PROOF OF SERVICE**

I certify that I have served the 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.,

May 16, 2017

By:

Robert B. Ransom

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Attorney for the Appellant

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May 16, 2017

By:

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May 16, 2017

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Columbia, SC 29211

**RECEIVED**  
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SC Court of Appeals

Re: Shon Turner v. MUSC  
Appellate Case No. 2016-001986

Dear Ms. Kitchings:

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

Also enclosed please find one copy of the 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.