

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

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OCT 16 2017

S.C. SUPREME COURT

AMY ELIZABETH WILLIAMS as the
PERSONAL REPRESENTATIVE of the
ESTATE FOR [REDACTED],
and AMY ELIZABETH WILLIAMS
individually,

Plaintiffs,

vs.

QUEST DIAGNOSTICS, INC., ATHENA
DIAGNOSTICS, INC., and
ADI HOLDINGS, INC.,

Defendants.

C.A. No. 3:16-cv-00972-MBS

**REPLY IN FURTHER SUPPORT OF
MOTION TO SUBMIT ADDITIONAL
MATERIALS TO THE SOUTH CAROLINA
SUPREME COURT**

In their brief to the South Carolina Supreme Court, Plaintiffs repeatedly reference the allegations of their First Amended Complaint. In response, Defendants' brief references the First Amended Complaint in order to rebut Plaintiffs' arguments. In their reply brief to the Supreme Court, Plaintiff objects to the Defendants' references to the First Amended Complaint and takes the position that "[s]ince Quest has made no motion or request either to this Court or to the Federal District Court to supplement its submission, Quest's references to such materials are improper and should be stricken from its brief." (Plaintiff's Reply Brief at 2)

Now, Defendants have moved to supplement the record and Plaintiffs object to the Motion to Submit Additional Materials. At its core, Plaintiffs' position is that they should be allowed to reference the allegations of their First Amended Complaint but the Defendants should not be allowed that same right.

Defendants respectfully request that this Court supplement the record before the Supreme Court with the First Amended Complaint and its attachments so that the Supreme Court may see the allegations that underlie this litigation and may make whatever use of those documents it deems appropriate.

Respectfully submitted,

WYCHE, P.A.

s/ John C. Moylan, III

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