

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Case No. 2012-CP-38-0845

RECEIVED
OCT 12 2017
SC Court of Appeals

Ralph C. Williams, Sr., and Linda Williams, Appellants,

v.

Patricia A. Johnson, Josette Peppers
and UniHealth Post-Acute Care – Orangeburg, LLC Respondents.

**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

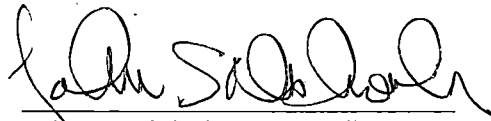
Appellants propose the following be included in the Record on Appeal:

1. Verdict Form;
2. Order of January 14, 2016;
3. Order Denying Motion to Reconsider of March 10, 2017;
4. UniHealth Answer;
5. Johnson Answer;
6. Peppers Answer;
7. Amended Complaint;
8. UniHealth Memo in Support of Motion for Summary Judgement;
9. Plaintiff's Post-Trial Motions with exhibits;
10. Defendants' Response to Post-Trial Motions of May 14, 2015;
11. Plaintiff's Reply Brief of May 26, 2015;
12. Response to Plaintiff's Post-Trial Memo on Issue of Stipulation;
13. Motion to Reconsider;
14. Defendant's Response to Motion to Reconsider;
15. Plaintiff's Supplemental Brief on Motion to Reconsider;
16. Defendant's Response to Supplemental Brief on Motion to Reconsider;
17. Plaintiff's Reply of August 11, 2016;
18. Transcript pp. 90-92, 149-150, 153-158, 160-169, 170-173, 175-178, 183, 185-191, 195-

- 199, 202, 204, 206, 208-213, 215, 218-219, 221, 223-225, 228-237, 239-241, 244-246, 248-256, 257-259, 261-265, 271-276, 278-280, 283-285, 288, 290-292, 294, 296-313, 324-328, 330-331, 335, 341-347, 349-350, 352-353, 355, 357-365, 370-372, 374, 378-379, 381-383, 384, 386-388, 390-395, 416-426, 429-433, 441-444, 451-457, 459-463, 485-487, 491-532, 534, 555, 557, 562-577, 586-587, 589-595, 598-599, 616-618, 652, 654, 662, 664-672, 680-684, 690-692, 694-699, 700-701, 703, 707, 716-717, 752-754, 757, 820-840, 842-843, 847-852;
19. Plaintiff's Exhibits. 2A, 2B, 2C, 3, 3A, 4, 4A, 6, 8, 9, 11, 12, 14B, 15A, 15B, 15C, 19, 20, 21, 25, 28, 29, 35A, 39, 50.

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

Respectfully submitted,



John S. Nichols, SC Bar # 4210
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Attorney for Appellants

October 12, 2017

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Motion for the Court to Accept the Brief Out of Time and the conditionally filed Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

Tyler L. Arnold
Arnall Golden Gregory, LLP
1626 Jeurgens Ct
Norcross, GA 30093

Jason E. Bring
Arnall Golden Gregory, LLP
171 17th St., NW, Ste. 2100
Atlanta, GA 30363


Erin Bridges

October 12, 2017

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SC Court of Appeals

VIA HAND DELIVERY


The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Ralph C. Williams, Sr., et al v. Patricia A. Johnson, et al
Case Tracking No.: 2017-000963

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for the Court to Accept the Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal Out of Time*. Also, please find enclosed the conditionally filed original and one (1) copy of the *Initial Brief of Appellants and Designation of Matter to be Included in the Record on Appeal*. I have also enclosed a proof of service upon counsel for the Respondent and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

/emb

Enclosures

cc: Robert P. Foster, Esquire
Javá O. Warren, Esquire
Tyler L. Arnold, Esquire
Jason E. Bring, Esquire