

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Hon. Deadra L. Jefferson, Circuit Court Judge

Case No. 2014-CP-10-4591
Appellate Case No. 2017-002392

RECEIVED
APR 12 2018
SC Court of Appeals

Jane Doe 202, by John Doe MM and John Doe HS,
each of whom holds power of attorney for Jane Doe..... Appellant,

v.


City of North Charleston; Leigh Anne McGowan,
individually, Charles Francis Wholleb, individually,
and Anthony M. Doxey, individually..... Respondents.

APPELLANT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant proposes to include in the record:

1. Judgment
2. Second Amended Complaint
3. Order granting motion for leave to use pseudonym, February 13, 2015
4. Motion for Leave to Use Pseudonym
5. Audio recordings of dispatcher informing McGowan that the mother had dementia
6. Plaintiff's Exhibit 2 (Incident Detail Report)

7. 10-3-17 pp. 21, 141, 149, 156, 166, 175 - 177, 180, 202, 211 - 214
8. 10-5-17 pp. 155 - 158, 169 - 170, 213
9. 10-6-17 p. 66 - 68, 133 - 135, 141 - 157
10. 10-9-17 p. 182.
11. 10-10-17 pp. 285, 636, 704- 706
12. 10-12-17 pp. 865 - 898,
13. 10-13-17 p. 952- 953, 960 -968, 973
14. Dr. Broadway video deposition transcript pp. 1-30.
15. Dr. Bolus video dep. at p. 17.
16. MUSC Record pages 1-299.
17. Exhibit 1 (photos substituted for the item)
18. Court's Exhibit 25


For Gregg Meyers (SC Bar No. 9908)
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CERTIFICATE OF COUNSEL

Pursuant to Rule 209(c), SCACR, counsel certifies that Appellant's Designation of
Matter contains no matter which is irrelevant to the appeal.


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PROOF OF SERVICE

I, the undersigned, certify that I have served Appellant's Designation of Matter and Certification of Counsel to the attorneys of record by depositing a copy of the same in the United States Mail on April 10, 2018 addressed to the following:

Chris Dorsel
Senn Legal, LLC
3 Wesley Drive
Charleston SC 29407


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April 10, 2018

Jenny Abbott Kitchings, Clerk of Court
The South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: Jane Doe 202 v. North Charleston
Appellate Case No. 2017-002392
File No. GM0023

Dear Ms. Kitchings:

Pursuant to your letter of April 5, 2018 wherein you informed me that my Designation of Matter was not filed with the required Certificate of Counsel, I am herein enclosing another Designation of Matter along with the required Certificate of Counsel and Proof of Service.

With kind regards,

Sincerely,


Gregg E. Meyers

cc: Christopher Dorsel, Esquire (w/ encl.)
Sandra J. Senn, Esquire (w/ encl.)
Robin Lilly Jackson, Esquire (w/ encl.)

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