

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

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Case No. 2018-001842

Mr. Joseph J. Tierney, Jr., Esquire,
Mr. Russell G. Hines, and Mr. Stephen
L. Brown, Counsels for the Respondents,
Dr. George H. Khoury and Bon Secours
Roper St. Francis West Ashley,
P, O. Box 993, 25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
843-577-4000

Respondent

RECEIVED
MAR 22 2019
SC Court of Appeals

vs

Thelma R. Garrick
195 Crescent Oaks Court
Orangeburg, South Carolina 29115
803-534-9912

Appellant


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

Appellant proposes the following Amended Designation of Matter be included in the Record on Appeal, Case number 2018-001842:

	<u>Item No.</u>
1. Order March 6, 2019 from South Carolina Court of Appeals	1
2. Proof of Experimental Surgery	2 a & b
3. Signed Release of Consent while under sedation just before going into operating room. Could not see Nurse held hand for signature. Also asked to initial top of form where there were two blurred lines of hand written notes, informed them I was only to have "fusion" so initialed by this word. (Time also important on signed release.)	3
4. Nurses taking Appellant to operation room awakened me arguing about who would witness my signature, neither said they would witness. The Circulator, who was not even there witnessed my signature.	4
5. Personal notes and drawing on appointment of 3-7-16. Appellant was shown an MRI of the Lumbar Spine that showed plainly the implant. Respondent explained in detail this part of the operation. (Respondent has never told Appellant anything else about the operation that was performed 8-20-15. It took Appellant three years to find out everything that was done.)	5
6. Appointment with Respondent on 4-18-16 was an attempt to Cover-up what was told to Appellant on the appointment of 3-7-16, including incorrect MRIs, tools on the table was explained as only the fusion was performed.	6, a, b, c
7. False information on Preoperative and Postoperative diagnosis and History and Physical reports.	7, d, e
8. Respondents paid to use experimental implants, Federal data and Medical data on Infuse device.	8 a,b,c,d,e, f, g, h
9. Names of Implants (still not 100% sure of the names)	9

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|-----|--|-------------------------------|
| 10. | Most operating room and hospital staff witnesses to surgery to be subpoenaed, two Medtronic Representatives that Respondent turned my body over to without her knowledge or Permission and witnesses regarding inhumane pain Appellant suffered. | 10 |
| 11. | Tape Recorder of message Respondent left on telephone answering machine. | 11 |
| 12. | Fourth Neurosurgeon's diagnosis and 7 hour surgical procedure to correct experimental surgery of 8-20-15. (Four doctors advised not to operate until it becomes imperative.) | 12, pp1 of 3 |
| 13. | MRIs (disks and films) | 1-30-15
3-04-15
7-26-18 |
| | CT Scan (disk and film) | 8-23-15 |
| | X-Rays (disk and film) | 7-26-18 |
| 14. | Hospital package given to Appellant on 4-18-16 when Respondent gave her 24 hours to get back to him with a date to operate to remove the implant in lumbar spine. | 14 |
| 15. | Other documents that compliment but not as imperative. | 15 |

March 21, 2019


 Thelma R. Garrick, Pro Se
 195 Crescent Oaks Ct.
 Orangeburg, S. C. 29115
 803-534-9912

cc: Mr. Joseph J. Tierney, Jr., Esquire

PROOF OF SERVICE OF DESIGNATION OF MATTER

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

CASE NO. 2018-001842

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Case No. 1018-CP-10-1163

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Young Clement Rivers, LLP
Law Firm, Joseph J. Tierney, Jr.,
Russell G. Hines, and Stephen L.
Brown Counsels for Respondents
Dr. George H. Khoury and Bon
Secours St. Francis, W. Ashley
843-577-4000

Respondent

vs

Thelma R. Garrick

Appellant

PROOF OF SERVICE

I certify that I have served the Amended Designation of Matter to Young Clement Rivers, LLP Law Firm, to the attention of Joseph J. Tierney, Jr. Esquire, Counsel for the Respondent, to P. O. Box 993, 25 Calhoun Street, Suite 400, Charleston, South Carolina 29402 by depositing a copy in the United States Mail, certified, prepaid on March 21, 2019 (copy enclosed).



Thelma R. Garrick
195 Crescent Oaks Ct.
Orangeburg, S. C. 29115
803-534-9912

March 21, 2019

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MAR 22 2019

SC Court of Appeals

March 21, 2019


Ms. V. Claire Allen, Deputy Clerk
The South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Thelma R. Garrick vs. Dr. George H. Khoury
Appellate Case No. 2018-001842

Dear Ms. Allen:

In reference to your letter of March 13, 2019, please find enclosed the Amended Designation of Matter and the Proof of Service. Thank you.

Yours truly,


Thelma R. Garrick

/tg

Enclosure

cc Mr. Joseph J. Tierney, Jr., Esquire

Shelma R. Garrick
195 Crescent Oaks Ct.
Orangeburg, S.C. 29115



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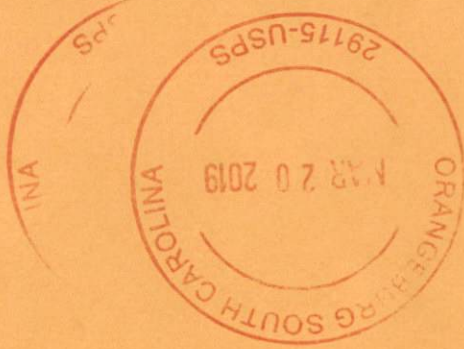


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