

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appellant Case No. 2018-001842

Appeal from Charleston County
Court of Common Pleas

Diane Shafer Goodstein, Circuit Court Judge

Case No. 2018-CP-10-01163

RECEIVED

JUL 26 2019

SC Court of Appeals

Thelma R. Garrick, Pro Se

vs


Appellant,

Dr. George H. Khoury and
Bon Secours St. Francis West Ashley

Respondents

APPELLANT'S INITIAL DESIGNATION OF MATTER

I certify that I have served the Appellant's Initial Designation of Matter to be included in the record on appeal to all parties to this matter, depositing copies in the U.S. Mail on July 25, 2019 posted to delivery to: Mr. Russell G. Hines, Esquire, Mr. Joseph John Tierney, Jr., Esquire, and Mr. Stephen Lynwood Brown, Esquire, Attorneys at YCRLaw Firm, for the Respondents, to the following address: P. O. Box 993, Charleston, South Carolina 29402, and located at 25 Calhoun St., Suite 400 (29401), telephone number 843-577-4000.


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

Dated this 5th day of July, 2019

/tg

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF
APPEALS

Case No. 2018-00-1842

July 25, 2019

A request that the Appellant's Initial Reply Designation of Matter be included in the Record on Appeal. A more detailed report is needed as the Respondents are once again trying to dismiss the case with "Appellant's Designation of Matter is not irrelevant (pertinent) to this appeal". It appears that Respondents again do not know or acknowledge the gravity of the Complaint because they have nothing tangible to refute appellant's case, only "lies" of permission regarding performing the massive experimental surgery.

Orders, Judgments, Decrees, or Decisions

1. Initial Complaint filed in Court of Common Pleas on March 5, 2018.
2. Motion to Dismiss by Respondents March 20, 2018 (No court stamp or Fee paid?)
3. Appellant's Motion to Dismiss Respondents request of 3-20-18, court stamp 4-3-2018, fee \$25.00
4. Notice of Motion Scheduling 6-13-2018, deadline to file 7-3 5PM
5. Motion to Extend Time June 29, 2018. (Return receipt received 7-2 AM (8:16 & 8:31 AM.), fee \$25.00
6. July 16, 2018 Request from Respondents a Motion to Dismiss in regards to case #2018-CP-10-1163. Again, no court stamp.
7. July 25, 2018 Notice of Judgment dismissing case in lower Court.
8. Defendants' Order Granting Motion to Dismiss filed, dated and signed by Circuit Court Judge.
9. Appeal to The South Carolina Court of Appeals October 5, 2018.
10. Motion to Barr Respondents record due to late filing.

Pleadings

1. March 29, 2018 Letter to Honorable Julie J. Armstrong regarding immediate Dismissal by Respondents attorneys. Also letter to Judge Goodstein (correspondence after case dismissed so no ex parte. Copies to all concerned.)

2. Rebuttal to YCRLaw, respondents attorneys Dismissal filed 4-3-18.
3. September 6, 2018 Motion to Appeal Dismissal of 7-25-18.

Transcript

4. Transcript of hearing dated July 12, 2018.

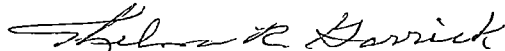
(Only date on docket questionable. Appellant called to find out why she had not heard back from the court regarding her request for an extension or if court had convened on the 12th. The Clerk at the Clerk of Court checked docket and said there was nothing on the 12th for Judge Goodstein but the date on the docket was the 23rd?) Date on Transcript is July 12, 2018.

Other Material or Documents

5. Doctor statements
6. Certified letter signed by Witness and doctors statements
7. Amended Brief of Appeal
8. Amended Designation of Matter
9. Other documents proving the case.

The Designation of Matter contains information that is pertinent to the Case.


Respectfully submitted,


Thelma R. Garrick, Appellant Pro Se
195 Crescent Oaks Ct.
Orangeburg, South Carolina 29115
803-534-9912

Copies deposited in the U.S. Mail to all parties on July 25, 2019:

cc: Young Clement Rivers, LLP
Mr. Russell G. Hines, Esquire
Mr. Stephen L. Brown, Esquire
Mr. Joseph J. Tierney, Jr., Esquire
Attorneys for Respondents
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P. O. Box 993 (29402)
843-720-5488

/tg


Thelma R. Garrick, Appellant
Initial Reply Brief

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appellant Case No. 2018-001842

Appeal from Charleston County
Court of Common Pleas

Diane Shafer Goodstein, Circuit Court Judge

Case No. 2018-CP-10-01163

Thelma R. Garrick, Pro Se

vs

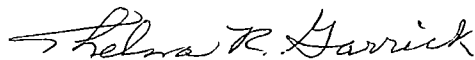
Dr. George H. Khoury and
Bon Secours St. Francis West Ashley

Appellant,

Respondents

PROOF OF SERVICE

I certify that I have served the Appellant's Initial Designation of Matter to be included in the record on appeal to all parties to this matter, depositing copies in the U.S. Mail on July 25, 2019 posted to delivery to: Mr. Russell G. Hines, Esquire, Mr. Joseph John Tierney, Jr., Esquire, and Mr. Stephen Lynwood Brown, Esquire, Attorneys at YCRLaw Firm, for the Respondents, to the following address: P. O. Box 993, Charleston, South Carolina 29402, and located at 25 Calhoun St., Suite 400 (29401), telephone number 843-577-4000.



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195 Crescent Oaks Court
Orangeburg, South Carolina 29115
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Dated this 5th day of July, 2019

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SC Court of Appeals

Ms. V. Claire Allen, Deputy Clerk
The South Carolina Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

Reference: Thelma R. Garrick, Appellant vs
Dr. George H. Khoury and Bon Secours
Roper St. Francis West Ashley,
Charleston, South Carolina

Appellate Case No. 2018-001842

Dear Ms. Allen:

Thank you for your letter of July 16, 2019. Enclosed you will find the corrected caption/title to read "Appellant's Initial Reply Brief" according to Rule 267(a), SCACR.

Yours truly,

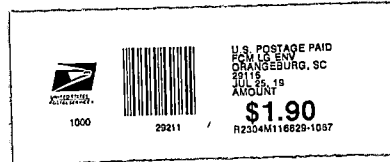


Thelma R. Garrick
Appellant pro se

/tg

cc: Mr. Russell Hines, Esquire
Mr. Joseph John Tierney, Jr., Esquire
Mr. Stephen Lynwood Brown, Esquire

Helen R. Garrick
195 Crescent Oaks Ct
Orangeburg, SC 29115



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M. V. Claire Allen, Deputy Clerk
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