

90867

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

Appeal from Charleston County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2018-001842  
Circuit Court Case No. 2018-CP-10-1163

**RECEIVED**  
SFP 16 2019  
SC Court of Appeals

Thelma R. Garrick,

Appellant,

v.

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

Respondents.

**RESPONDENTS MOTION FOR LEAVE TO  
FILE SUPPLEMENTAL RECORD ON APPEAL**

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
Joseph J. Tierney, Jr.  
Russell G. Hines  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Respondents*

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

COMES NOW Respondents, Dr. George H. Khoury and Bon Secours St. Francis West Ashley, by and through their undersigned counsel, and hereby respectfully request that this Honorable Court grant it leave to file/serve the attached Supplemental Record on Appeal and to cite thereto in its Final Brief of Respondent, which is provisionally filed contemporaneously herewith.

The attached Supplemental Record on Appeal includes only the following substantive matter: *Plaintiff's Motion to Extend Time, filed July 2, 2018*, which was designated for inclusion in the Record on Appeal by Respondents. [See Respondents' Designation of Matter to be Included in the Record on Appeal (with Proof of Service) dated June 28, 2019, which is attached hereto as **Exhibit A** and incorporated herein by reference.] Although the Record on Appeal prepared by Appellant included most of the matter that Respondents designated for inclusion, it did not include this item.

Respondents submit that there is good cause to grant the present motion, such motion being consistent with the interests of justice and not unduly prejudicial to any party.

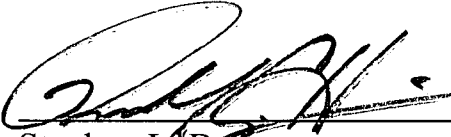
WHEREFORE, Respondents respectfully request that the proposed Supplemental Record on Appeal (the original, along with the requisite number of copies under Rule 210(b), SCACR, being filed herewith, and a copy now served on

Appellant, be allowed and accepted as filed along with the Final Brief of Respondents, which cites thereto, and which is provisionally filed contemporaneously herewith.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown

Joseph J. Tierney, Jr.

Russell G. Hines

25 Calhoun Street, Suite 400 (29401)

P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

*Attorneys for Respondents*

Charleston, South Carolina

Dated: \_\_\_\_\_

9/13/15

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

Appeal from Charleston County  
Court of Common Pleas

JUL 03 2019

SC Court of Appeals

Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2018-001842  
Circuit Court Case No. 2018-CP-10-1163

Thelma R. Garrick,

Appellant,

v.

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

Respondents.

DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL BY RESPONDENTS

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
Joseph J. Tierney, Jr.  
Russell G. Hines  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Respondents*

EXHIBIT

A

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

Respondents Dr. George H. Khoury and Bon Secours St. Francis West Ashley propose the following to be included in the Record on Appeal:

**Orders, Judgments, Decrees, or Decisions**

1. Order Granting Motion to Dismiss, filed July 25, 2018;

**Pleadings**

2. Complaint, filed March 5, 2018;

**Transcripts**

3. Transcript of Hearing held July 12, 2018;

**Other materials or documents**

4. Defendants Motion to Dismiss, filed March 22, 2018;
5. Plaintiff's Rebuttal to Defendants' Motion to Dismiss, filed April 3, 2018;
6. Plaintiff's Motion to Extend Time, filed July 2, 2018.

I certify that this Designation of Matter contains no matter which is irrelevant to this appeal.

*[Signature on next page]*

*[Signature page for Designation of Matter to be Included  
in the Record on Appeal by Respondents, Civil No. 2018-001842]*

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen E. Brown

Joseph J. Tierney, Jr.

Russell G. Hines

25 Calhoun Street, Suite 400 (29401)

P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

*Attorneys for Respondents*

Charleston, South Carolina

Dated: 6/28/19

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Charleston County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

---

Appellate Case No. 2018-001842  
Circuit Court Case No. 2018-CP-10-1163

**RECEIVED**

JUL 03 2019

SC Court of Appeals

Thelma R. Garrick,

Appellant,

v.

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

Respondents.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
Joseph J. Tierney, Jr.  
Russell G. Hines  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Respondents*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Respondents above named, do hereby certify that I have served the **DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL BY RESPONDENTS** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on June 28, 2019, addressed as follows:

Thelma R. Garrick  
195 Crescent Oaks Ct.  
Orangeburg, SC 29115  
*Pro Se Appellant*

YOUNG CLEMENT RIVERS, LLP

By:



Russell G. Hines  
*Attorneys for Respondents*

Charleston, South Carolina

Dated: 6/28/19

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

---

Appeal from Charleston County  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

---

Appellate Case No. 2018-001842  
Circuit Court Case No. 2018-CP-10-116

---

**RECEIVED**

SFP 16 2019

SC Court of Appeals

Thelma R. Garrick,

Appellant,

v.

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

Respondents.

---

**PROOF OF SERVICE**

---

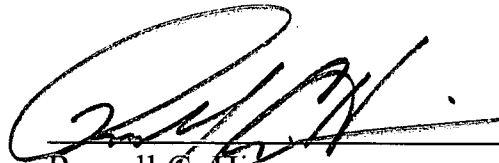
YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown  
Joseph J. Tierney, Jr.  
Russell G. Hines  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Respondents*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Respondents above named, do hereby certify that I have served the **RESPONDENTS MOTION FOR LEAVE TO FILE SUPPLEMENTAL RECORD ON APPEAL** and the **SUPPLEMENTAL RECORD ON APPEAL** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on September 13, 2019, addressed as follows:

Thelma R. Garrick  
195 Crescent Oaks Ct.  
Orangeburg, SC 29115  
*Pro Se Appellant*

YOUNG CLEMENT RIVERS, LLP

By:

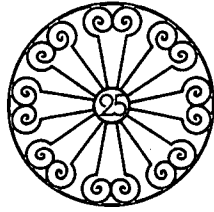


Russell G. Hines

*Attorneys for Respondents*

Charleston, South Carolina

Dated: 9/13/19



YCR LAW

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1369  
E-mail: kbarnes@ycrlaw.com

September 13, 2019

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Thelma R. Garrick v. Dr. George H. Khoury, Bon Secours St. Francis West  
Ashley  
Appellate Case No. 2018-001842  
Case No.: 2018-CP-10-1163

**RECEIVED**

SFP 16 2019

**SC Court of Appeals**

Dear Ms. Kitchings:

Enclosed please find the following:

1. Original and seven (7) copies of Respondents Motion for Leave to File Supplemental Record on Appeal;
2. Original and sixteen (16) copies of the Supplemental Record on Appeal;
3. Original and one (1) copy of Proof of Service for Respondents Motion for Leave to File Supplemental Record on Appeal and the Supplemental Record on Appeal;
4. Our firm's check in the amount of \$50.00 representing the filing fee for said motion;
5. Original and sixteen (16) copies of the Final Brief of Respondents;
6. Original and one (1) copy of Respondents' Certification for Final Brief; and
7. Original and one (1) copy of the Proof of Service for the Final Brief of Respondents and Respondents' Certification for Final Brief.

Please file the originals and return court-stamped copies of each document to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YCR LAW, LLP

Kathleen B. Barnes  
Secretary

Enclosures

cc: Thelma R. Garrick

Hasler

PRIORITY MAIL

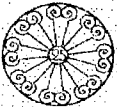
09/13/2019

US POSTAGE \$010.55



ZIP 29401  
011E12650887

**FIRST CLASS MAIL**



**YCRLAW**

25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402-0993

KBB  
3810-  
20180252

Jenny Abbott Kitchings, Clerk of  
Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
SEP 16 2019  
SC Court of Appeals