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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Case No. 2018-NI-02-00003  
Appellate Case No.: 2019-000803

Fonda E. Patrick and Andre Patrick ..... Appellants,

v.

Gasnel E Bryan, M.D., individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; Frank Y. Chase, M.D., individually and as agent and/or employee of Aiken Regional Medical Centers, LLC; Jonathan H. Anderson, individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; and Aiken Regional Medical Centers, LLC, Defendants

Of which Gasnel E Bryan, M.D., individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; Frank Y. Chase, M.D., individually and as agent and/or employee of Aiken Regional Medical Centers, LLC; and Aiken Regional Medical Centers, LLC are Respondents.

**RESPONDENT AIKEN REGIONAL MEDICAL CENTERS, LLC'S MOTION TO AMEND ITS DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent filed its Designation of Matter to be Included in the Record on Appeal on October 11, 2019 along with its Initial Brief. The Designation of Matter included Defendant Aiken Regional Medical Centers, LLC's Memorandum in Opposition to Plaintiff's Motion to Reconsider (hereinafter "the Memorandum"). The Memorandum should not have been included as it was never actually filed in the Circuit Court. After discussing with Appellants' counsel, Respondent filed and served an Amended Designation on November 21, 2019 (attached hereto as Exhibit A);

however, the Amended Designation was mistakenly filed without an accompanying motion to amend. On December 5, 2019, Appellant filed and served the Record on Appeal, which correctly omitted the Memorandum.

Now, pursuant to the Clerk of Court's December 10, 2019 letter, Respondent hereby moves the Court for leave to file the Amended Designation of Matter, so that Respondent's designation of matter conforms to the Record on Appeal.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.



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Kenneth N. Shaw (SC Bar 77859)

J. Ben Alexander (SC Bar 15323)

Post Office Box 2048

Greenville, South Carolina 29602

(864) 240-3200

[kshaw@hsblawfirm.com](mailto:kshaw@hsblawfirm.com)

[balexander@hsblawfirm.com](mailto:balexander@hsblawfirm.com)

*Attorneys for Respondent*

Aiken Regional Medical Centers, LLC

Dated: December 13, 2019

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Of which Gasnel E Bryan, M.D., individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; Frank Y. Chase, M.D., individually and as agent and/or employee of Aiken Regional Medical Centers, LLC; and Aiken Regional Medical Centers, LLC are Respondents.

**PROOF OF SERVICE**

This is to certify that the foregoing RESPONDENT AIKEN REGIONAL MEDICAL CENTERS, LLC'S MOTION TO AMEND ITS DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL were served in the above-referenced case by placing copies of said documents in the United States Mail on this 13<sup>th</sup> day of December, 2019, addressed as follows:

Francis M. Hinson, IV  
Finkel Law Firm  
PO Box 1799  
Columbia, SC 29202

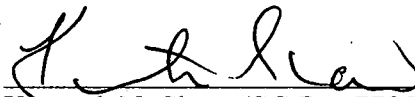
*Attorney for Fonda E. Patrick and Andrew Patrick*

James D. Nance  
Nance McCants & Massey  
218 Newberry Street, SW  
Aiken, SC 29801  
*Attorney for Gasnel E. Bryan, MD*

Hutson S. Davis, Jr.  
Johnson & Davis, PA  
10 Pinckney Colony Road  
Suite 200  
Bluffton, SC 29909  
*Attorney for Frank Y. Chase, MD*

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.



Kenneth N. Shaw (SC Bar 77859)  
J. Ben Alexander (SC Bar 15323)  
Post Office Box 2048  
Greenville, South Carolina 29602  
(864) 240-3200  
[kshaw@hsblawfirm.com](mailto:kshaw@hsblawfirm.com)  
[balexander@hsblawfirm.com](mailto:balexander@hsblawfirm.com)

*Attorneys for Respondent*  
Aiken Regional Medical Centers, LLC

Dated: December 13, 2019

**HAYNSWORTH  
SINKLER BOYD**

HAYNSWORTH SINKLER BOYD, P.A.  
ONE NORTH MAIN STREET, 2<sup>ND</sup> FLOOR  
P.O. BOX 2048 (29602)  
GREENVILLE, SOUTH CAROLINA 29601  
MAIN 864.240.3200  
FAX 864.240.3300  
www.hsblawfirm.com

KENNETH N. SHAW  
DIRECT 864.240.4541  
kshaw@hsblawfirm.com

December 13, 2019

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**SC Court of Appeals**

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

Re: Fonda E. Patrick and Andre Patrick, Appellants v. Centers, LLC; Gasnel E. Bryan, M.D., individually and as an agent and/or employee of Aiken Regional Medical Centers, LLC; Frank Y. Chase, M.D., individually and as agent and/or employee of Aiken Regional Medical Centers, LLC; and Aiken Regional Medical Centers, LLC  
Appellate Case No.: 2019-000803  
Case No.: 2018-CP-02-00003  
HSB File No.: 33074.0018

Dear Ms. Kitchings:

Pursuant to the Clerk of Court's December 10, 2019 letter, please find enclosed the original and one copy of Respondent Aiken Regional Medical Centers, LLC's Motion to Amend Its Designation of Matter to be Included in the Record on Appeal along with the required \$50.00 filing fee.

After filing, please return a file-stamped copy to me in the self-addressed, postage paid envelope enclosed for your convenience. By copy of this letter, I am serving a copy of same upon counsel for the Appellants, Francis M. Hinson, IV, counsel for Respondent Bryan, James D. Nance, and counsel for Respondent Chase, Hutson S. Davis, Jr. Please feel free to contact me should you have any questions or concerns.

Sincerely,



Kenneth N. Shaw

Enclosures

**HAYNSWORTH  
SINKLER BOYD**

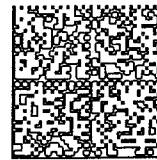
cc: Francis M. Hinson, IV  
Finkel Law Firm  
PO Box 1799  
Columbia, SC 29202

James D. Nance  
Nance McCants & Massey  
218 Newberry Street, SW  
Aiken, SC 29801

Hutson S. Davis, Jr.  
Johnson & Davis, PA  
10 Pinckney Colony Road  
Suite 200  
Bluffton, SC 29909

**HAYNSWORTH  
SINKLER BOYD**

P.O. BOX 2048  
GREENVILLE, SOUTH CAROLINA 29602-2048



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