

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Case No. 2019-001102

Lower Court Case No. 2019-NI-02-00001

**RECEIVED**  
DEC 18 2019  
SC Court of Appeals

Grace Gray, Individually and as Wife of Willie J. Gray, deceased, and as Personal Representative of the Estate of Wille J. Gray, deceased, .....Respondent,

v.

PruittHealth-North Augusta, LLC; UHS Pruitt Corporation a/k/a PruittHealth, Inc.; PruittHealth Consulting Services, Inc.; United Health Services of South Carolina, Inc.; John Doe, and Richard Roe Corporation, .....Appellants.

**RESPONDENT’S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent proposes the following to be included in the Record on Appeal:

1. Pleadings:
  - a. Filed copy of Plaintiff’s Notice of Intent to File Suit dated January 3, 2019, including Exhibit A (Affidavit of Mary Foote, RN, BSN, MSN, ANP, CWCN-AP, Ed. Dc.);
  - b. Filed copy of Plaintiff’s Response in Opposition to Defendants’ Notice of Motion and Motion to Dismiss Plaintiff’s Notice of Intent dated March 1, 2019, including Exhibits A, B, C, and D;
  - c. Filed copy of Plaintiff’s Response in Opposition to Defendants’ Motion to Reconsider dated May 14, 2019;
2. Admission Agreement (Exhibit B to Defendants’ Notice of Motion and Motion to Dismiss Plaintiff’s Notice of Intent dated February 11, 2019);

I certify that this designation contains no matter which is irrelevant to this appeal.

Dated: December 16, 2019



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C. Caleb Connor, SC Bar No. 100517  
Kenneth L. Connor, SC Bar No. 100298  
A. Keith McAlister, Jr., SC Bar No. 78213  
Anne K. Moore, SC Bar No. 101018  
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Attorneys for Respondent

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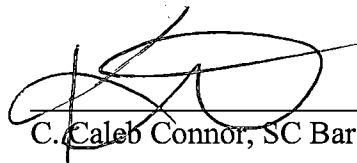
v.

PruittHealth-North Augusta, LLC; UHS Pruitt Corporation a/k/a PruittHealth, Inc.; PruittHealth Consulting Services, Inc.; United Health Services of South Carolina, Inc.; John Doe, and Richard Roe Corporation, .....Appellants.

**PROOF OF SERVICE**

I certify that this the 16 th day of December, 2019, I have caused to be served a copy of the Initial Brief of Respondent and Respondent's Designation of Matter to be Included in the Record on Appeal upon Appellants PruittHealth-North Augusta, LLC; UHS Pruitt Corporation a/k/a PruittHealth, Inc.; PruittHealth Consulting Services, Inc.; United Health Services of South Carolina, Inc.; John Doe, and Richard Roe Corporation, causing a copy of same to be deposited in the United States mail, postage prepaid, addressed as following:

Joshua S. Whitley  
S. Tyler Graves  
Smyth Whitley, LLC  
126 Seven Farms Drive, Suite 260  
Charleston, South Carolina 29492

  
C. Caleb Connor, SC Bar No. 100517

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Attorneys for Respondent

# CONNOR & CONNOR, LLC

TRIAL LAWYERS

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December 16, 2019

**Via U.S. Mail**

The Honorable Jenny Abbott Kitchings  
Clerk of Court for the Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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**SC Court of Appeals**

Re: *Grace Gray, Individually and as Wife of Willie J. Gray, deceased, and as Personal Representative of the Estate of Willie J. Gray, deceased v. PruittHealth-North Augusta, LLC; UHS Pruitt Corporation a/k/a PruittHealth, Inc.; PruittHealth Consulting Services, Inc.; United Health Services of South Carolina, Inc.; John Doe, and Richard Roe Corporation*  
Appellate Case No.: 2019-001102

Dear Ms. Kitchings,

Enclosed for filing please find the original and one copy of Respondent Grace Gray's Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal in the above-referenced case. Also enclosed is proof of service of the Brief and Designation of Matter.

Please file the documents and return one file-stamped copy in the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions, please do not hesitate to contact me. Thank you

Kind regards,

CONNOR & CONNOR, LLC



A. Keith McAlister, Jr.

Enclosures

cc: Joshua S. Whitley, Esq.



**CONNOR & CONNOR, LLC**  
TRIAL LAWYERS  
302 PARK AVENUE SE  
AIKEN, SOUTH CAROLINA 29801

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Hon. Jenny Abbott Kitchings  
Clerk of Court for the Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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