

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

Civil Action No. 2018-CP-40-02545
Appellate Case No. 2020-000067

RECEIVED
JUN 19 2020
SC Court of Appeals

Dr. Kaoru Pridgen,

Appellant,

v.

Colonial Family Practice, LLC,
Varsity Family Care Partners, LLC,
Family Care Partners d/b/a
Family Care Partners Management,
LLC, Dr. Clay Lowder, Thomas
W. Watson, and Dr. Gary R. Katz

Respondents.

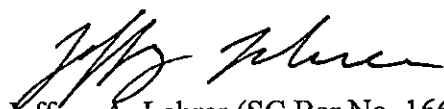
RESPONDENT'S DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent Varsity Family Care Partners, LLC propose that the following be included in the Record on Appeal:

1. Order granting Varsity's Motion for Summary Judgment, filed December 20, 2019;
2. December 5, 2019 Hearing Transcript;
3. Complaint, filed May 9, 2018;
4. Amended Complaint, filed March 14, 2019;
5. Answer of Varsity Family Care Partners, LLC, to Amended Complaint, filed April 15, 2019;
6. Varsity's Motion for Summary Judgment, filed August 30, 2019;
7. Memorandum in Opposition to Varsity's Motion for Summary Judgment, filed December 3, 2019;
8. Varsity's Reply in Support of Its Motion for Summary Judgment filed December 4, 2019;

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

June 17, 2020



Jeffrey A. Lehrer (SC Bar No. 16687)

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Attorney for Respondent

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W. Watson, and Dr. Gary R. Katz

Respondents.

**CERTIFICATE OF SERVICE OF INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER
VARSITY FAMILY CARE PARTNERS, LLC**


I certify that I have served the Initial Brief of Respondent and Designation of Matter by
placing a copy in the United States Mail, postage prepaid, addressed to:

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Dated: June 17, 2020



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June 17, 2020

VIA UNITED STATES MAIL

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

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SC Court of Appeals

Re: *Dr. Kaoru Pridgen v. Colonial Family Practice, LLC et al.*
Appellate Case No. 2020-000067

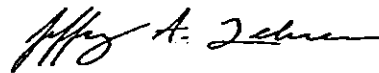
Dear Ms. Kitchings:

Please find enclosed, the original and one copy of Respondents' Initial Brief, along with the Proof of Service and Designation of Matter thereof. Please file the original and return a file-stamped copy to us in the self-addressed, stamped envelope enclosed for your convenience.

If you have any questions regarding Respondents' Brief, please do not hesitate to contact me.

With highest regards I remain,

Very truly yours,



JEFFREY A. LEHRER

JAL/hmr

cc: Lyndey Bryant, Esq.
Jennifer Dunlap, Esq.
Shannon Polvi, Esq.

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The Honorable Jenny Abbott Kitchings
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