

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

RECEIVED

JUN 29 2020

C.A. No. 2019-CP-37-00271
Appellate Case No. 2019-002009

SC Court of Appeals

Jane Doe Appellant,

v.

Oconee Memorial Hospital; Greenville Health System; Upstate Affiliate Organization; Kevin Docyk, MD; Mary Beth Hendricks Respondents.

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

Initially, Respondents have concerns and/or objections regarding a few of the documents designated by Appellant:

- 3. Respondents are not aware of a document filed in this action titled, "Defendants' Memorandum in Support of its Motion to Dismiss."
- 4. The date of the Form 4 Order was actually April 11, 2019.
- 13. Respondents object to the inclusion of "Plaintiff's Supplemental Memorandum in Opposition to Defendant's Motion for Summary Judgment" on the basis that it is irrelevant to the issues on appeal. The supplemental memorandum focuses solely on Appellant's arguments related to her discovery requests; however, Appellant

never served any discovery request in the instant action, and Appellant abandoned those arguments in her appeal of the action in which she served the discovery requests.

In addition to those matters previously designated by Appellant, Respondents would add the following:

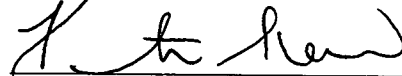
1. Notice of Intent of File Suit
2. All documents submitted to the circuit court during the September 23, 2019 hearing, including all documents evidencing correspondence between the parties related to discovery issues.

Each of the materials identified above as well as all of those previously designated by Appellant should include all attached exhibits. If the identical document is attached to multiple designated items, Respondents consent to the item only being included in the Record on Appeal one time; however, the index should note all attachments to each item as filed and provide the page number in the Record on Appeal where that item can be found.

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

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.



Kenneth N. Shaw (SC Bar 77859)

Post Office Box 2048

Greenville, South Carolina 29602

(864) 240-3200

kshaw@hsblawfirm.com

Attorney for Respondents

Dated: June 26, 2020

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In The Court of Appeals

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Case No. 2019-CP-37-00271
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Jane Doe Appellant,

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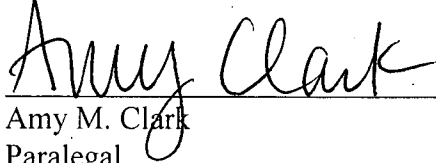
Oconee Memorial Hospital; Greenville Health System; Upstate Affiliate Organization; Kevin Docyk,
MD; Mary Beth Hendricks Respondents.

PROOF OF SERVICE

This is to certify that the foregoing INITIAL BRIEF OF RESPONDENTS AND 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 the 26th day of June, 2020, addressed as follows:

Hannah Metcalfe
Courtney Atkinson
Metcalfe & Atkinson, LLC
PO Box 1826
Greenville, SC 29602

HAYNSWORTH SINKLER BOYD, P.A.



Amy M. Clark
Paralegal

PO Box 2048

Greenville, South Carolina 29602

(864) 240-3200

Dated: June 26, 2020
Greenville, South Carolina

**HAYNSWORTH
SINKLER BOYD**

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KENNETH N. SHAW
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JUN 29 2020

SC Court of Appeals

June 26, 2020

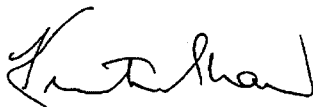
The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Jane Doe v. Oconee Memorial Hospital; Greenville Health System; Upstate Affiliate
Organization; Kevin Docyk, MD; Mary Beth Hendricks
Appellate Case No.: 2019-002009
HSB File No.: 08565.0890

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal, together with our Certificate of Service of same. 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 Appellant, Hannah Metcalfe, Esq. and Courtney Atkinson, Esq. Please feel free to contact me should you have any questions or concerns.

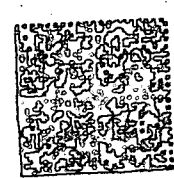
Sincerely,



Kenneth N. Shaw

Enclosures

cc: Hannah Metcalf
Courtney Atkinson
Metcalf & Atkinson
PO Box 1826
Greenville, SC 29602



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