

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
Jul 06 2020
SC Court of Appeals

APPEAL FROM YORK COUNTY
Daniel D. Hall, Circuit Court Judge

Appellate Case No. 2020-000838
Case No. 2016-CP-46-3181

Rita Pratt, Individually and as the Personal Representative of
the Estate of William Pratt, Deceased, Respondent,

v.

Amisub of South Carolina, Inc. d/b/a Piedmont Medical Center,
Jaleesa Heyward, R.N., South Carolina Emergency Physicians,
LLC; Jonas Varaly, D.O.; Rock Hill Radiology Associates,
LLC; and Geoffrey T. Gilleland, M.D., Defendants,

Of Whom, Rock Hill Radiology Associates, LLC and Geoffrey
T. Gilleland, M.D. are Appellants.

AMENDED NOTICE OF APPEAL

The Appellants Rock Hill Radiology Associates, LLC and Geoffrey T.
Gilleland, M.D. amend their previously filed Notice of Appeal and hereby appeal
the judgment entered on February 11, 2020; the Form Order Denying Post-Trial

Motions filed on May 4, 2020, as issued by Circuit Court Judge Daniel D. Hall; and the Form Order Denying the Defendant's Motion to Alter or Amend Judgment, filed on June 25, 2020, as issued by Circuit Court Judge Daniel D. Hall.

The Appellants' counsel received written notice of entry of the Form Order Denying the Defendant's Motion to Alter or Amend Judgment, filed on June 25, 2020, on that same date.

LINDEMANN, DAVIS & HUGHES, P.A.

BY: s/ Andrew F. Lindemann
ANDREW F. LINDEMANN #13030
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920
Email: andrew@ldh-law.com

HENRIKSON LAW FIRM, LLC

BY: s/ Matthew H. Henrikson
MATTHEW H. HENRIKSON #7897
Post Office Box 26554
Greenville, South Carolina 29616
(864) 672-7106
Email: mhenrikson@henriksonlaw.com

Counsel for Appellants Rock Hill Radiology Associates, LLC and Geoffrey T. Gilleland, M.D.

July 6, 2020

Other Counsel of Record:

Chad A. McGowan
S.C. Bar #9943
Ashley White Creech
S.C. Bar #74901
Eve S. Goodstein
S.C. Bar #101211
McGowan, Hood & Felder, LLC
1539 Health Care Drive
Rock Hill, South Carolina 29732
(803) 327-7800
Email: cmcgowan@mcgowanhood.com
Email: acreech@mcgowanhood.com
Email: egoodstein@mcgowanhood.com

Counsel for Respondent

STATE OF SOUTH CAROLINA
COUNTY OF York
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

Jul 06 2020

CASE NO. 2016CP4603181

SC Court of Appeals

ELECTRONICALLY FILED - 2020 May 04 12:39 PM - YORK - COMMON PLEAS - CASE#2016CP4603181

Rita Pratt et al
PLAINTIFF(S)

Rock Hill Radiology Associates Llc et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):** Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit); Rule 43(k), SCRPC (Settled);
 Other
- ACTION STRICKEN (CHECK REASON):** Rule 40(j), SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**
 Affirmed; Reversed; Remanded;
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order (formal order to follow) Statement of Judgment by the Court:

Defendant's motion for Judgment notwithstanding the Verdict (JNOV), or alternatively, Defendant's motion for a New Trial Absolute is denied. Defendant is entitled to a set off of Plaintiff's claims in the amount of \$83,333.33 each for the survival claim and the loss of consortium claim from the time the judgment was rendered on February 10th, 2020. it is so ordered.

ORDER INFORMATION

This order ends does not end the case. See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 05/04/2020 .

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

RECEIVED

Jul 06 2020

SC Court of Appeals



York Common Pleas

Case Caption: Rita Pratt , plaintiff, et al VS Rock Hill Radiology Associates Llc ,
defendant, et al
Case Number: 2016CP4603181
Type: Order/Electronic Form 4

So Ordered

s/Daniel D. Hall 2753

Electronically signed on 2020-05-04 10:48:46 page 3 of 3

ELECTRONICALLY FILED - 2020 May 04 12:39 PM - YORK - COMMON PLEAS - CASE#2016CP4603181

RECEIVED

Jul 06 2020 FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF YORK
IN THE COURT OF COMMON PLEAS

SC Court of Appeals

JUDGMENT IN A CIVIL CASE
CASE NUMBER 2016CP4603181

ELECTRONICALLY FILED - 2020 Feb 11 9:32 AM - YORK - COMMON PLEAS - CASE#2016CP4603181

Rita Pratt William Pratt	Rita Pratt Personal Representative William Pratt Estate	Rock Hill Radiology Associates LLC Jonas Varaly	Geoffrey T Gilliland
-----------------------------	---	---	----------------------

PLAINTIFF(S)	DEFENDANT(S)
Submitted by:	Attorney for: <input type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered. See Page 2 for additional information.
- ACTION DISMISSED (CHECK REASON): Rule 12(b), SCRPC; Rule 41(a), SCRPC (Vol. Nonsuit);
 Rule 43(k), SCRPC (Settled); Other: _____
- ACTION STRICKEN (CHECK REASON): Rule 40(j) SCRPC; Bankruptcy;
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; Other: _____
- STAYED DUE TO BANKRUPTCY
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):
 Affirmed; Reversed; Remanded; Other:

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: See attached order; (formal order to follow) Statement of Judgment by the Court:

ORDER INFORMATION

This order ends does not end the case.

Additional Information for the Clerk: SEE ATTACHED VERDICT FORM(S)

INFORMATION FOR THE JUDGMENT INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)

If applicable, describe the property, including tax map information and address, referenced in the order:

The judgment information above has been provided by the submitting party. Disputes concerning the amounts contained in this form may be addressed by way of motion pursuant to the SC Rules of Civil Procedure. Amounts to be computed such as interest or additional taxable costs not available at the time the form and final order are submitted to the judge may be provided to the clerk.

Note: Title abstractors and researchers should refer to the official court order for judgment details.

E-Filing Note: In E-Filing counties, the Court will electronically sign this form using a separate electronic signature page.

Daniel D. Hall
Circuit Court Judge

2753

Judge Code

2-10-20

Date

For Clerk of Court Office Use Only

This judgment was entered on February _____, 2020 and a copy mailed first class or placed in the appropriate attorney's box on February _____, 2020 to attorneys of record or to parties (when appearing pro se) as follows:

Chad Alan McGowan 1539 Health Care Dr. Rock Hill, SC 29732
Eve Schafer Goodstein 1539 Health Care Drive Rock Hill, SC 29732
Susan Foxworth Campbell 137 Professional Lane, Suite B Pawleys Island, SC 29585
Jay Franklin Wright 135 Edinburgh Court Suite 202 Greenville, SC 29607
Ashley White Creech 1539 Healthcare Drive Rock Hill, SC 29732

William U. Gunn PO Box 1897 Spartanburg, SC 29304
Jack G Gresh 111 Coleman Boulevard Suite 301 Mount Pleasant, SC 29464
Lauren Spears Gresh 111 Coleman Boulevard Suite 301 Mount Pleasant, SC 29464
Matthew Holmes Henrikson PO Box 26554 Greenville, SC 29616
Jonathan S. Arndt 111 Coleman Boulevard Suite 301 Mount Pleasant, SC 29464
Ayla G. Luers Connor PO Box 1897 Spartanburg, SC 29304

ATTORNEY(S) FOR THE PLAINTIFF(S)

ATTORNEY(S) FOR THE DEFENDANT(S)

David Hamilton

Court Reporter: **Kymerlee Williams**

David Hamilton - Clerk of Court

Court Reporter:

E-Filing Note: In E-Filing counties, the date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgement to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

ADDITIONAL INFORMATION REGARDING DECISION BY THE COURT AS REFERENCED ON PAGE 1.

This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

ELECTRONICALLY FILED - 2020 Feb 11 9:32 AM - YORK - COMMON PLEAS - CASE#2016CP4603181

STATE OF SOUTH CAROLINA

) IN THE COURT OF COMMON PLEAS
) SIXTEENTH JUDICIAL CIRCUIT

COUNTY OF YORK

) CIVIL ACTION NO.: 2016-CP-46-3181

Rita Pratt, Individually and as the Personal
Representative of the Estate of William Pratt,
Deceased,

Plaintiff,

VERDICT FORM

v.

Jonas Varaly, DO; Rock Hill Radiology
Associates, LLC; and Geoffrey T. Gilleland,
MD,

Defendants.

1. Do you unanimously find, by the greater weight of the evidence, that any of the following Defendants deviated from the standard of care as explained to you through the evidence in the trial and the court's charge of the law to you?

YES

NO

(If NO, stop deliberating. If YES, identify which Defendants)

Jonas Varaly, DO

Rock Hill Radiology Associates, LLC

Geoffrey T. Gilleland, MD

2. Do you unanimously find, by the greater weight of the evidence, that any deviation from the standard of care by the Defendants identified in your answer to Question 1 was the proximate or legal cause of Mr. William Pratt's injuries? If so, provide the percentage of fault for each Defendant selected (it must add up to 100%).

YES

NO

(If NO, stop deliberating. If YES, prove the percentage of fault for each Defendant selected)

0% Jonas Varaly, DO

10% Rock Hill Radiology Associates, LLC

90% Geoffrey T. Gilleland, MD

3. If your answer to Question No. 2 is YES, provide the amount of damages you find Plaintiff has proven for each cause of action?

\$ _____ Wrongful Death Action

\$ 360,000 Survival Action

\$ 640,000 Loss of Consortium

4. Do you unanimously find that the Defendant(s) identified in your answer to Questions 1 and 2, were reckless or grossly negligent in their care and treatment of William Pratt?

YES

NO

(If NO, stop deliberating. If YES, identify which Defendants)

_____ Jonas Varaly, DO

Rock Hill Radiology Associates, LLC

Geoffrey T. Gilleland, MD

5. Do you find that the Plaintiffs have proven by clear and convincing evidence that the Defendants acted recklessly, willfully or wantonly in their care and treatment of William Pratt?

YES

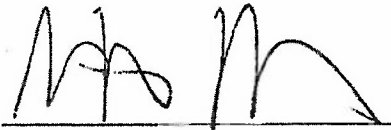
NO

(If NO, stop deliberating. If YES, identify which Defendants)

Jonas Varaly, DO

Rock Hill Radiology Associates, LLC

Geoffrey T. Gilleland, MD



Foreperson
February 10, 2020

****When you have completed and signed the Verdict Form, please notify the Bailiff****

STATE OF SOUTH CAROLINA)
)
COUNTY OF YORK)
)
Rita Pratt, Individually and as the Personal)
Representative of the Estate of William Pratt,)
Deceased,)
)
Plaintiff,)
)
v.)
)
Jonas Varaly, DO; Rock Hill Radiology)
Associates, LLC; and Geoffrey T. Gilleland,)
MD,)
)
Defendants.)


IN THE COURT OF COMMON PLEAS
SIXTEENTH JUDICIAL CIRCUIT
CIVIL ACTION NO.: 2016-CP-46-3181

VERDICT FORM

RECEIVED
Jul 06 2020
SC Court of Appeals

Please list the amount of punitive damages awarded against each Defendant:

\$ 0 Rock Hill Radiology, LLC
\$ 0 Geoffrey T. Gilleland, M.D.



Foreperson
February 10, 2020

When you have completed and signed the Verdict Form, please notify the Bailiff

From: [Hall, Daniel D. Law Clerk \(Bryant Cannon\)](#)
To: [Chad McGowan](#); [Andrew Lindemann](#); jgresh@hallboothsmith.com; [Ashley Creech](#); [Matt Henrikson](#); [Jordan Calloway](#)
Cc: [Hall, Daniel D. Secretary \(Renee Graham Barker\)](#); [Strait, Lynn](#)
Subject: RE: Pending Motions re: 2016CP4603181 Rita Pratt et al v. Rock Hill Radiology Associates et al w/ attys. Chad McGowan, Matt Hendrickson & Jack Gresh
Date: Tuesday, April 28, 2020 10:43:56 AM

Counsel,

The Court agrees that the Form 4 along with the transcript and court record are sufficient for the Court of Appeals to render a decision. The Form 4 will include the set off in the amount of \$83,333.33 each on the survival claim and the loss of consortium claim.

Thank you,

Bryant Cannon
Law Clerk
To the Honorable Judge Daniel D. Hall

From: Chad McGowan <cmcgowan@mcgowanhood.com>
Sent: Monday, April 27, 2020 10:15 AM
To: Hall, Daniel D. Law Clerk (Bryant Cannon) <dhalllc@sccourts.org>; Andrew Lindemann <Andrew@LDH-Law.com>; jgresh@hallboothsmith.com; Ashley Creech <acreech@mcgowanhood.com>; Matt Henrikson <matt@henriksonlaw.com>; Jordan Calloway <jordan@mcgowanhood.com>
Cc: Hall, Daniel D. Secretary (Renee Graham Barker) <dhallsc@sccourts.org>; Strait, Lynn <Lynn.strait@yorkcountygov.com>
Subject: Re: Pending Motions re: 2016CP4603181 Rita Pratt et al v. Rock Hill Radiology Associates et al w/ attys. Chad McGowan, Matt Hendrickson & Jack Gresh

***** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. *****

Mr. Cannon:

- 1) We believe a Form 4 order is appropriate to dispose of the motions. We believe the trial transcript and court record will provide the Court of Appeals with whatever it needs to decide any appeal.
- 2) We believe a set off of \$83,333.33 on the Survival action and \$83,333.33 on the loss of consortium action is proper. We ask that the Court enter judgment for the Plaintiff on the Survival action for \$276,666.67 and on the Loss of Consortium action for \$556,666.67 *nunc pro tunc* to February 10, 2020 (the date of the verdict). The reason for this is to have a proper calculation of the post judgment interest.

Thank you.

Chad McGowan
McGowan, Hood, and Felder, LLC
1539 Health Care Drive
Rock Hill, SC 29732
803-327-7800
cmcgowan@mcgowanhood.com
www.mcgowanhood.com

CIRCULAR 230 DISCLOSURE: To comply with Treasury Department regulations, we inform you that, unless otherwise expressly indicated, any tax advice contained in this communication (including any attachments or enclosures) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed under the Internal Revenue Code or any other applicable tax law, or (ii) promoting, marketing or recommending to another party any entity, investment, plan, transaction, arrangement, or other tax related matter.

CONFIDENTIALITY NOTICE: The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or legally privileged material. Any review, retransmission, dissemination or other use of this information, directly or indirectly, by persons or entities other than the intended recipient is prohibited. If you are not the intended recipient please contact me at the above number and delete the material from all computers in which it resides. Internet communications cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late, incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this message, or any attachments, that have arisen as a result of e-mail transmission. If verification is required, please request a hard-copy version or contact us by phone.

From: "Hall, Daniel D. Law Clerk (Bryant Cannon)" <dhalllc@sccourts.org>
Date: Monday, April 27, 2020 at 10:06 AM
To: Andrew Lindemann <Andrew@LDH-Law.com>, Chad McGowan <cmcgowan@mcgowanhood.com>, Jack Gresh <jgresh@hallboothsmith.com>, Ashley Creech <acreech@mcgowanhood.com>, Matt Henrikson <matt@henriksonlaw.com>, Jordan Calloway <jordan@mcgowanhood.com>
Cc: "Hall, Daniel D. Secretary (Renee Graham Barker)" <dhallsc@sccourts.org>, Lynn Strait <Lynn.strait@yorkcountygov.com>
Subject: RE: Pending Motions re: 2016CP4603181 Rita Pratt et al v. Rock Hill Radiology Associates et al w/ attys. Chad McGowan, Matt Hendrickson & Jack Gresh

Mr. Henrikson,

Thank you for your email. Does Plaintiff's counsel have a position on Mr. Henrikson's requests?

Thank you,

Bryant T. Cannon, Esq.
Law Clerk
To The Honorable Judge Daniel D. Hall
Chief Administrative Judge of the Sixteenth Judicial Circuit
1675 York Hwy, York, SC 29745
T: (803) 818-6806
E: DhallLC@sccourts.org

From: Matt Henrikson <matt@henriksonlaw.com>
Sent: Thursday, April 23, 2020 5:06 PM
To: Hall, Daniel D. Law Clerk (Bryant Cannon) <dhalllc@sccourts.org>
Cc: Andrew Lindemann <Andrew@ldh-law.com>; Chad McGowan <cmcgowan@mcgowanhood.com>; jgresh@hallboothsmith.com; Hall, Daniel D. Secretary (Renee Graham Barker) <dhallsc@sccourts.org>; Ashley Creech <acreech@mcgowanhood.com>; Jordan Calloway <jordan@mcgowanhood.com>; Strait, Lynn <Lynn.strait@yorkcountygov.com>
Subject: Re: Pending Motions re: 2016CP4603181 Rita Pratt et al v. Rock Hill Radiology Associates et al w/ attys. Chad McGowan, Matt Hendrickson & Jack Gresh

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Mr. Cannon, thank you for the prompt email.

We would respectfully request a formal written order at the Court's convenience. That will be needed in order for my clients to be able to perfect their appeal and will also avoid the necessity of filing a Rule 59(e) motion. The Court of Appeals will need to understand the basis of the Court's rulings that a form order does not provide.

On the set off issue, we would respectfully ask for clarification. Is the Court rejecting just the 90% set off on the loss of consortium award or all set offs? In their memorandum, the Plaintiff did not argue that the Defendants were not entitled to a set off – just that the set off “should be based on the allocation of settlement funds stated in the order approving Ms. Pratt’s settlement with PMC.” Thus, we were wondering if the Court will be allowing the set off of \$83,333 each on the loss of consortium and survival verdicts which is the allocation from the settlement with PMC.

Thanks, Matt

On Thu, Apr 23, 2020 at 9:36 AM Hall, Daniel D. Law Clerk (Bryant Cannon) <dhalllc@sccourts.org> wrote:

Good Morning Counsel,

The Defendant's motion for Judgment notwithstanding the Verdict (JNOV), or alternatively, Defendant's motion for a New Trial Absolute, or alternatively, Defendant's motion for Reduction of Verdict and Set-Off is denied. A Form 4 reflecting this disposition will be filed and signed this week.

Thank you,

Bryant T. Cannon, Esq.

Law Clerk

To The Honorable Judge Daniel D. Hall

Chief Administrative Judge of the Sixteenth Judicial Circuit

1675 York Hwy, York, SC 29745

T: (803) 818-6806

E: DhallLC@sccourts.org

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

STATE OF SOUTH CAROLINA  
COUNTY OF York  
IN THE COURT OF COMMON PLEAS

CASE NO. 2016CP4603181

SC Court of Appeals

ELECTRONICALLY FILED - 2020 Jun 25 12:09 PM - YORK - COMMON PLEAS - CASE#2016CP4603181

Rita Pratt et al  
PLAINTIFF(S)

Rock Hill Radiology Associates Llc et al  
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  
 Other
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  
 Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  
 Other
- STAYED DUE TO BANKRUPTCY**
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  
 Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED:  See attached order (formal order to follow)  Statement of Judgment by the Court:

After the Court's careful consideration, Defendant's Motion to Alter/Amend the Judgment is Denied, it is so ordered.

ORDER INFORMATION

This order  ends  does not end the case.

See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 06/25/2020 .

Case Party Info Protected

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

**Court Reporter:**

**E-Filing Note:** The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRPC.

---



York Common Pleas

**Case Caption:** Rita Pratt , plaintiff, et al VS Rock Hill Radiology Associates Llc ,  
defendant, et al  
**Case Number:** 2016CP4603181  
**Type:** Order/Electronic Form 4

So Ordered

s/Daniel D. Hall 2753

RECEIVED

Jul 06 2020

SC Court of Appeals

---

CERTIFICATE OF SERVICE

---

Pursuant to Section (g)(3) of the Supreme Court's Order Re: Operation of the Trial Courts During the Coronavirus Emergency (As Amended May 29, 2020), the undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Appellants Rock Hill Radiology Associates, LLC and Geoffrey T. Gilleland, M.D., does hereby certify that service of the **Amended Notice of Appeal** was made upon all counsel of record by email only this the 6th day of July 2020:

**Via Email Only**

Chad A. McGowan, Esquire  
Ashley White Creech, Esquire  
Eve S. Goodstein, Esquire  
McGowan, Hood & Felder, LLC  
Email: [cmcgowan@mcgowanhood.com](mailto:cmcgowan@mcgowanhood.com)  
Email: [acreech@mcgowanhood.com](mailto:acreech@mcgowanhood.com)  
Email: [egoodstein@mcgowanhood.com](mailto:egoodstein@mcgowanhood.com)

**Via Email Only**

Matthew H. Henrikson, Esquire  
Henrikson Law Firm, LLC  
Email: [mhenrikson@henriksonlaw.com](mailto:mhenrikson@henriksonlaw.com)

**Via Email Only**

Jack G. Gresh, Esquire  
Jonathan S. Arndt, Esquire  
Hall Booth Smith, P.C.  
Email: [jgresh@hallboothsmith.com](mailto:jgresh@hallboothsmith.com)  
Email: [jarndt@hallboothsmith.com](mailto:jarndt@hallboothsmith.com)

**Via Email Only**

William U. Gunn, Esquire  
Holcombe Bomar, P.A.  
Email: [bgunn@holcombebomar.com](mailto:bgunn@holcombebomar.com)

s/ Andrew F. Lindemann



RECEIVED  
Jul 06 2020  
SC Court of Appeals

Telephone (803) 881-8920  
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
Columbia, South Carolina 29260

July 6, 2020

ANDREW F. LINDEMANN\*  
Direct Dial: (803) 881-8921  
Email: [andrew@ldh-law.com](mailto:andrew@ldh-law.com)

JAMES M. DAVIS, JR.†  
Direct Dial: (803) 881-8922  
Email: [jim@ldh-law.com](mailto:jim@ldh-law.com)

JOEL S. HUGHES†  
Direct Dial: (803) 881-8923  
Email: [joel@ldh-law.com](mailto:joel@ldh-law.com)

\*Also Admitted in North Carolina  
†Certified Mediator

*Of Counsel*

STEVEN R. SPREEUWERS  
Direct Dial: (803) 373-2268  
Email: [steve@ldh-law.com](mailto:steve@ldh-law.com)

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Rita Pratt, Individually and as the Personal Representative of the Estate of William Pratt, Deceased v. Amisub of South Carolina, Inc. d/b/a Piedmont Medical Center, Jaleesa Heyward, RN, South Carolina Emergency Physicians, LLC; Jonas Varaly, DO; Rock Hill Radiology Associates, LLC; and Geoffrey T. Gilleland, MD  
Appellate Case Number: 2020-000838  
Civil Action Number: 2016-CP-46-3181  
Claim Number: CB168396M  
Our File Number: 22.20277

Dear Ms. Kitchings:

Please find enclosed for filing the **Amended Notice of Appeal** in the above referenced matter. The filing fee for this appeal was previously provided to the Court when Appellants filed the original Notice of Appeal on June 3, 2020. By copy of this letter, I am serving copies on all counsel of record via email only pursuant to Section (g)(3) of the Supreme Court's Order RE: Operation of the Appellate Courts During the Coronavirus Emergency (As Amended May 29, 2020).

Thank you for your assistance in this matter. If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosure

The Honorable Jenny Abbott Kitchings  
July 6, 2020  
Page Two

---

cc: (w/ Enclosure)

**Via Email Only**

Chad A. McGowan, Esquire  
Ashley White Creech, Esquire  
Eve S. Goodstein, Esquire  
McGowan, Hood & Felder, LLC  
Email: [cmcgowan@mcgowanhood.com](mailto:cmcgowan@mcgowanhood.com)  
Email: [acreech@mcgowanhood.com](mailto:acreech@mcgowanhood.com)  
Email: [egoodstein@mcgowanhood.com](mailto:egoodstein@mcgowanhood.com)

**Via Email Only**

Matthew H. Henrikson, Esquire  
Henrikson Law Firm, LLC  
Email: [mhenrikson@henriksonlaw.com](mailto:mhenrikson@henriksonlaw.com)

**Via Email Only**

Jack G. Gresh, Esquire  
Jonathan S. Arndt, Esquire  
Hall Booth Smith, P.C.  
Email: [jgresh@hallboothsmith.com](mailto:jgresh@hallboothsmith.com)  
Email: [jarndt@hallboothsmith.com](mailto:jarndt@hallboothsmith.com)

**Via Email Only**

William U. Gunn, Esquire  
Holcombe Bomar, P.A.  
Email: [bgunn@holcombebomar.com](mailto:bgunn@holcombebomar.com)