

October 31, 2020

RECEIVED
NOV 02 2020
SC Court of Appeals

Ms. Jenny A. Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Reference: Thelma R. Garrick vs. Dr. George H. Khoury
and Bon Secours Roper St. Francis W. Ashley
Case No. 2018-001842 in the S.C. Court of Appeals

Dear Ms. Kitchings:

Enclosed you will find two Motions and a Supplemental Record requesting they be made a part of the Record on Appeal. In your letter you stated that if Appellant desired this to be included I must return the documents ten days from the date of your letter. As you know mail from Columbia I receive three days later or the third day.

This has been no problem in the past, however, the exception this time I have been very ill but tried to continue working anyway when Tuesday came and I was no better, only to make more mistakes. My intentions were to get everything mailed off by 5 PM Friday October 30, 2020 but had everything completed except addressing the mail to every one. Appellate trusts that Saturday, October 31st will be acceptable? Please reply as soon as possible in case you have to advise me where to go to get permission. Thank you.
(No virus, not the implants this time 'I hope', but Dr. Van Horn will give me a fit.)

Appellant was also advised that the normal mailing procedure is not to be adhered to because of the Virus. Therefore you will receive one each of the Motions, and two copies of the Supplemental request. If this is not correct, please advise, additional copies are ready to be forwarded.

Yours truly,


Thelma R. Garrick, Appellant
Pro se

/tg

cc: ✓ Ms. V Claire Allen, Chief Deputy Clerk
Messrs. Joseph J. Tierney, Jr.,
Stephen L. Brown and Russell G. Hines;
Attorneys at Law for Respondents.

Enclosure: Two checks in the amount of \$50.00 each.

*(letter only) w/overview of
documents forwarded
this day, October 31, 2020.*

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**Appeal from Charleston County
Diane Schaffer Goodstein, Circuit Court Judge**

**Appellate Case No. 2018-001842
Circuit Court No. 2018-CP-10-1163**

Thelma R. Garrick

Appellant

v

**Dr. George H. Khoury and Bon
Secours Roper St. Francis W. Ashley**

Respondents

**SUPPLEMENTAL RECORD ON APPEAL
October 30, 2020**

**Thelma R. Garrick, Appellant
195 Crescent Oaks Court
Orangeburg, South Carolina 29115
803-534-9912**

**Young Clement Rivers, LLP
Attorneys for the Respondents**

**Mr. Stephen L. Brown, Esquire
Mr. Joseph J. Tierney, Jr., Esquire
Mr. Russell G. Hines, Esquire
25 Calhoun St., Suite 400 (29401
P. O. Box 993, Charleston, S.C.
29402 (Telephone 843-577-4000)**

**Ms. Jenny A. Kitchings, Clerk
The S. C. Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201**

/tg

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Diane Schaffer Goodstein, Circuit Court Judge

Appellate Case No. 2018-001842
Circuit Court No. 2018-CP-10-1163

Thelma R. Garrick	Appellant
v	
Dr. George H. Khoury and Bon Secours Roper St. Francis W. Ashley	Respondents

Supplemental Record of Appellate Motions dated 10-28-20. Appellate requests that these two Motions be made a part of the Supplemental Records on Appeal, and has deposited a copy of the same in the United States Mail on October 30, 2020 addressed as follows:

PROOF OF SERVICE

Thelma R. Garrick, Appellant
195 Crescent Oaks Court
Orangeburg, South Carolina 29115
803-534-9912

Young Clement Rivers, LLP
Attorneys for the Respondents

Mr. Stephen L. Brown, Esquire
Mr. Joseph J. Tierney, Jr., Esquire
Mr. Russell G. Hines, Esquire
25 Calhoun St., Suite 400 (29401
P. O. Box 993, Charleston, S.C.
29402 (Telephone 843-577-4000)

Ms. Jenny A. Kitchings, Clerk
The S. C. Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

/tg

STATE OF SOUTH CAROLINA

COUNTY OF Charleston

Helma R. Harrick Appellant
Plaintiff

Dr. George H. Khoury, Bon
Secundus Roper St. Francis W. Oakley
Defendant
Respondents

IN THE COURT OF COMMON PLEAS

JUDICIAL CIRCUIT

Circuit Court Case No.
CASE NO: 2018CP-10-1163
Appellant Case No. 2018-001842

**MOTION AND ORDER INFORMATION
FORM AND COVERSHEET**

Plaintiff's Attorney: <u>Pro se</u> Bar No. _____ Address: <u>195 Crescent Oaks Ct.</u> <u>Orangetburg, SC 29115</u> Phone: <u>803-534-9912</u> E-mail: _____ Other: _____		Defendant's Attorney: <u>Young Clement Rivers</u> Bar No. <u>Attorney for Respondents</u> Address: <u>25 Calhoun Street 4th</u> <u>Charleston, S.C. 29401</u> <u>(P.O. Box 993 (29402))</u> Phone: _____ Fax _____ E-mail: _____ Other: _____	
☐ MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) ☒ FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) ☐ PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)			
SECTION I: Hearing Information Nature of Motion: <u>To correct reason Appellant filed case, and why case</u> Estimated Time Needed: _____ Court Reporter Needed: ☐ YES ☒ NO <u>should not be dismissed</u>			
SECTION II: Motion/Order Type ☒ Written motion attached ☐ Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order. <u>Helma R. Harrick</u> <u>10-28-20</u> Signature of Attorney for ☒ Plaintiff / ☐ Defendant Date submitted			
SECTION III: Motion Fee ☒ PAID - AMOUNT: \$ <u>50.00</u> ☐ EXEMPT: (check reason) ☐ Rule to Show Cause in Child or Spousal Support ☐ Domestic Abuse or Abuse and Neglect ☐ Indigent Status ☐ State Agency v. Indigent Party ☐ Sexually Violent Predator Act ☐ Post-Conviction Relief ☐ Motion for Stay in Bankruptcy ☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRCP) ☒ Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ ☐ Other: <u>Clerk Mrs. Jenny A. Kitchings</u>			
JUDGE'S SECTION ☐ Motion Fee to be paid upon filing of the attached order. ☐ Other: _____		JUDGE CODE _____ Date: _____	
CLERK'S VERIFICATION Collected by: _____ Date Filed: _____ ☐ MOTION FEE COLLECTED: \$ _____ ☐ CONTESTED - AMOUNT DUE: \$ _____			

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**Appeal from Charleston County
Court of Common Pleas**

Diane S. Goodstein, Circuit Court Judge

**Appellate Case No. 2018-001842
Circuit Court Case No. 2018-CP-10-1163**

Thelma R. Garrick

Appellant

vs

**Dr. George H. Khoury and Bon Secours
St. Francis West Ashley**

Respondents

**MOTION TO CORRECT A COMMON LAW WRIT. TO
CORRECT A JUDGMENT IN THE SAME COURT IN
WHICH IT WAS ENTERED, UPON THE GROUND OF
ERROR OF FACT.**

**THIS MOTION IS TO CORRECT REASON APPELLANT FILED, AND IS TO BE
INCLUDED IN THE SUPPLEMENTAL RECORD ON APPEAL.**


**Thelma R. Garrick, Pro se
195 Crescent Oaks Court
Orangeburg, South Carolina 29115
803-534-9912**

STATE OF SOUTH CAROLINA

COUNTY OF Charleston

Helma R. Garrick

Plaintiff,

vs.
Dr. George H. Rhoury, Bon Secours
Roger M. Francis W. Ashley

Defendant

IN THE COURT OF COMMON PLEAS

JUDICIAL CIRCUIT

CASE NO.: 2018-CP-10-1163

Appellant Case No. 2018-001842

**MOTION AND ORDER INFORMATION
FORM AND COVERSHEET**

Plaintiff's Attorney: <u>Pro se</u> Bar No. _____ Address: <u>195 Crescent Oaks Ct.</u> <u>Orangeburg, S.C. 29115</u> Phone: _____ Fax: <u>803-534-9912</u> E-mail: _____ Other: _____		Defendant's Attorney: <u>Young Clement Rivers, LLP</u> Bar No. <u>Attorney for Respondent</u> Address: <u>25 Calhoun, Suite 400,</u> <u>Charleston, S.C. 29401</u> Phone: _____ Fax: <u>P.O. Box 993, 29402</u> <u>843-577-4000</u> E-mail: _____ Other: _____	
☐ MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) ☒ FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) ☐ PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)			
SECTION I: Hearing Information Nature of Motion: <u>Motion to include medical information / Overview</u> Estimated Time Needed: _____ Court Reporter Needed: ☐ YES / ☒ NO <u>for case pending</u>			
SECTION II: Motion/Order Type ☒ Written motion attached ☐ Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order. <u>Helma R. Garrick</u> <u>10-28-20</u> Signature of Attorney for ☒ Plaintiff / ☐ Defendant Date submitted			
SECTION III: Motion Fee ☒ PAID - AMOUNT: \$ <u>50.00</u> ☐ EXEMPT: (check reason) ☐ Rule to Show Cause in Child or Spousal Support ☐ Domestic Abuse or Abuse and Neglect ☐ Indigent Status ☐ State Agency v. Indigent Party ☐ Sexually Violent Predator Act ☐ Post-Conviction Relief ☐ Motion for Stay in Bankruptcy ☐ Motion for Publication ☐ Motion for Execution (Rule 69, SCRPC) ☐ Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ ☐ Other: <u>Clerk - Ms. Jenny A. Kitchings</u>			
JUDGE'S SECTION ☐ Motion Fee to be paid upon filing of the attached order. ☐ Other: _____		JUDGE CODE _____ Date: _____	
CLERK'S VERIFICATION Collected by: _____ Date Filed: _____ ☐ MOTION FEE COLLECTED: \$ _____ ☐ CONTESTED - AMOUNT DUE: \$ _____			

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

**Appeal from Charleston County
Court of Common Pleas**

Diane S. Goodstein, Circuit Court Judge

Thelma R. Garrick

Appellant

v

**Dr. George H. Khoury and Bon
Secours Roper St. Francis W. Ashley**

Respondents

**MOTION DATED 10-28-20 TO BE INCLUDED
INTO RECORD ON APPEAL AND
SUPPLEMENTAL RECORD ON APPEAL
Request of October 28, 2020**

**New information on FDA notification of 2008 regarding life threatening
complications; and an overview of combined documents, in order, to make case No.
2018-CP-10-163 more easily accessible.**

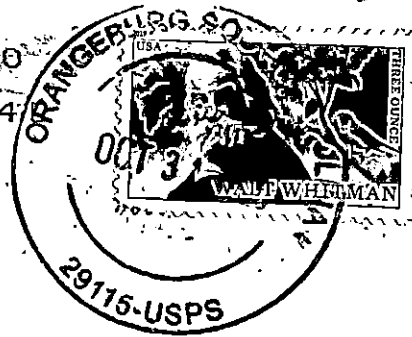
**Thelma R. Garrick, Appellant
195 Crescent Oaks Court
Orangeburg, South Carolina 29115
803-534-9912**

**Attorneys for Respondents
Young Clement Rivers, LLP
Stephen L. Brown
Joseph J. Tierney, Jr.
Russell G. Hines
25 Calhoun St., Suite 400
Charleston, S. C. 29401
P. O. Box 993 (29402
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Thelma R. Garrick
195 Crescent Oaks Ct.
Orangeburg, S.C. 29115

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Chief Deputy Clerk
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