

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Mar 24 2021

SC Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2019-001921

Tekayah Hamilton, individually and as parent and guardian ad litem for Robert Lee M. Jr., a minor child under the age of 18,Respondent,

v.

Regional Medical Center,.....Appellant.

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

Respondent Tekayah Hamilton, individually and as parent and guardian ad litem for Robert Lee M. Jr., a minor child under the age of 18, designates the following to be included in the Record on Appeal with any necessary redactions pursuant to Supreme Court Order 2014-04-15-02, including but not limited to the minor’s last name:

1. Notice of Appeal, filed November 19, 2019
2. Order granting Defendant’s motion for reduction to statutory cap and denying Defendant’s motion for JNOV or in the alternative for a new trial, filed October 25, 2019
3. Complaint, filed October 7, 2015
 - a. Affidavit of Monica Stobbs, filed October 7, 2015
 - b. Professional Background of Monica Stobbs, filed October 7, 2015
4. Answer of the Defendants, filed November 30, 2015
5. Plaintiff’s Responses to Defendant’s Request to Admit, dated December 14, 2015

6. Notice of Motion and Motion in Limine to Exclude Monica Stobbs Testimony, dated May 1, 2018,
 - a. Including all exhibits
7. Notice of Motion and Motion for JNOV or in the alternative Motion for New Trial, filed May 17, 2018
8. Post Trial Motion for Reduction to Statutory Cap, filed May 17, 2018
9. Plaintiff's Memorandum in Opposition to Defendant's Motion for JNOV or in the alternative Motion for New Trial/New Trial *Nisi Remittitur* and in Opposition to Defendant's Motion for Reduction to Statutory Cap, filed June 13, 2018
10. Transcript of pre-trial hearing on May 7, 2018
 - a. Pp. 1-4, 7-17, 22-23
11. Transcript of Trial from May 7-9, 2019
 - a. Pp. 1-6, 52-211, 221-451
12. Trial Exhibits:
 - a. Plaintiff's Exhibit 1: photo
 - b. Plaintiff's Exhibit 2: photo
 - c. Plaintiff's Exhibit 3: photo
 - d. Plaintiff's Exhibit 4: Medical records, with all necessary redactions of personally identifying information
 - e. Plaintiff's Exhibit 5: RMC policies
 - f. Plaintiff's Exhibit 7: Wound care center bill
 - g. Plaintiff's Exhibit 8: Dr. DeVito letter and invoices
13. Verdict form, dated May 9, 2018

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

March 24, 2021

Respectfully submitted,

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