

April 29, 2013

Via Hand Delivery

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Edgar Brown Building
1205 Pendleton Street
Columbia, SC 29201

**Re: Ann Adams v. Rock Hill Radiology Associates, P.A., et al.
Appellate Case # 2012-212832**

Our File No. 4180-076

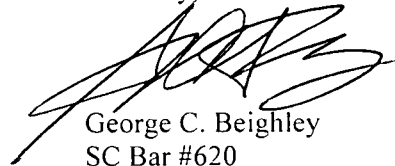
Dear Ms. Kitchings:

As counsel for Respondents Rock Hill Radiology Associates, P.A. and James E. Reinhardt, Jr., M.D., I have enclosed for filing an original (unbound) and 15 copies of Final Respondents' Brief as well as an Amended Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our original Certificates of Service for each. The reason for the Amended Designation of Matter is due to previous No. 13 (Dr. Reinhardt and Rock Hill Radiology's Memorandum in Support of Motion to Dismiss) is non-existent. I have also enclosed an additional copy of our Final Respondents' Brief, Amended Designation of Matter and Certificates of Service and would request that these be filed-stamped and returned to our courier.

We are this day serving a copy of our Respondents' Final Brief and Amended Designation of Matter on counsel of record.

Thank you for your assistance.

Sincerely,


George C. Beighley
SC Bar #620

cc: James W. Boyd, Esq. (w/ encls)
William U. Gunn, Esq. (w/ encls)
N. Heyward Clarkson, Esq. (w/ encls)

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY

Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Civil Action No. 11-CP-46-3984

Ann P. Adams, as Personal Representative of
the Estate of Jacob E. Adams, DeceasedAppellant,

vs.

Amisub of South Carolina, Inc., d/b/a
Piedmont Medical Center and d/b/a
Piedmont Healthcare System;

Staci L. Versen-Rampey, NP,
Individually and as Agent, Servant or
Employee of South Carolina Emergency
Physicians, LLC, and as Agent, Servant or
Employee of Amicus of South Carolina,
Inc., d/b/a Piedmont Medical Center and
d/b/a Piedmont Healthcare System,

Jason Price, Radiologic Technologist,
Individually and as Agent, Servant or
Employee of Amisub of South Carolina,
Inc., d/b/a Piedmont Medical Center and
d/b/a Piedmont Healthcare System, and

James E. Reinhardt, Jr., M.D.,
Individually and as Agent, Servant or
Employee of Rock Hill Radiology
Associates, PA, and as Agent, Servant
Or Employee of Amisub of South Carolina,
Inc., d/b/a Piedmont Medical Center and
d/b/a Piedmont Healthcare System,

Rock Hill Radiology Associates, P.A.,
South Carolina Emergency Physicians,
LLC,Respondents.

RECEIVED

APR 29 2013

SC Court of Appeals

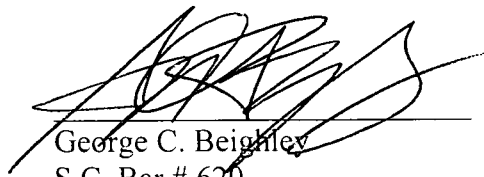
**AMENDED DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL OF RESPONDENTS JAMES E. REINHARDT, JR., M.D., AND
ROCK HILL RADIOLOGY ASSOCIATES, P.A.**

Respondents James E. Reinhardt, Jr., M.D., and Rock Hill Radiology Associates, P.A., propose the following be included in the Record on Appeal:

1. Order of Judge Hayes July 12, 2012
2. Order of Judge Hayes July 31, 2012
3. Notice of Intent to File Suit and attachments
4. Amended Notice of Intent to File Suit and attachments
5. Summons and Complaint
6. Amended Summons and Amended Complaint
7. Dr. Reinhardt and Rock Hill Radiology's Motion to Dismiss Amended Notice of Intent to File Suit
8. Dr. Reinhardt and Rock Hill Radiology's Motion to Dismiss Amended Summons and Complaint
9. Transcript of hearing on Motions To Dismiss June 27, 2012
10. Affidavit of Diane Berinsky
11. Affidavit of Plaintiff Ann Adams
12. Plaintiff's Brief in Opposition to Motion to Dismiss
13. Dr. Reinhardt and Rock Hill Radiology's Reply to Plaintiff's Brief in Opposition to Motions to Dismiss
14. Proof of Service of Amended Notice of Intent and Amended Summons and Complaint on Dr. Reinhardt and Rock Hill Radiology

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

Respectfully submitted,



George C. Beighley
S.C. Bar # 620
Richardson Plowden & Robinson, P.A.
1900 Barnwell Street
Columbia, South Carolina 29201
(803) 771-4400

**Attorneys for Respondents James E. Reinhardt,
Jr., M.D., and Rock Hill Radiology Associates,
P.A.**

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY

Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Civil Action No. 11-CP-46-3984

Ann P. Adams, as Personal Representative of
the Estate of Jacob E. Adams, DeceasedAppellant,

vs.

Amisub of South Carolina, Inc., d/b/a
Piedmont Medical Center and d/b/a
Piedmont Healthcare System;

Staci L. Versen-Rampey, NP,
Individually and as Agent, Servant or
Employee of South Carolina Emergency
Physicians, LLC, and as Agent, Servant or
Employee of Amicus of South Carolina,
Inc., d/b/a Piedmont Medical Center and
d/b/a Piedmont Healthcare System,

Jason Price, Radiologic Technologist,
Individually and as Agent, Servant or
Employee of Amisub of South Carolina,
Inc., d/b/a Piedmont Medical Center and
d/b/a Piedmont Healthcare System, and

James E. Reinhardt, Jr., M.D.,
Individually and as Agent, Servant or
Employee of Rock Hill Radiology
Associates, PA, and as Agent, Servant
Or Employee of Amisub of South Carolina,
Inc., d/b/a Piedmont Medical Center and
d/b/a Piedmont Healthcare System,

Rock Hill Radiology Associates, P.A.,
South Carolina Emergency Physicians,
LLC,Respondents.

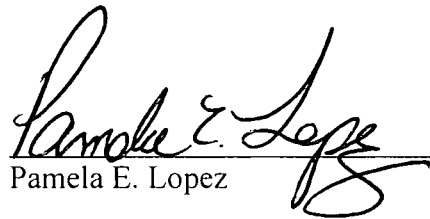
CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., attorneys for Respondents James E. Reinhardt, Jr., M.D., and Rock Hill Radiology Associates, P.A., do hereby certify that I have this date served the foregoing **Amended Designation of Matter** by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the following:

James W. Boyd, Esquire
P.O. Box 36425
Rock Hill, SC 29732

William U. Gunn, Esquire
Holcombe Bomar, P.A.
P.O. Drawer 1897
Spartanburg, SC 29304

N. Heyward Clarkson, III, Esquire
Clarkson, Walsh, Terrell & Coulter, P.A.
1164 A Woodruff Road (29607)
Post Office Box 6728
Greenville, SC 29606


Pamela E. Lopez

Dated: April 29, 2013