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Feb 28 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The 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, RN; South Carolina Emergency Physicians, LLC; Jonas Varaly,  
DO; Rock Hill Radiology Associates, LLC; and Geoffrey T. Gilleland,  
MD,..... Defendants,

Of Which, Rock Hill Radiology Associates, LLC, and Geoffrey T.  
Gilleland, MD are ..... Appellants.

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

The Appellants Geoffrey T. Gilleland, M.D. and Rock Hill Radiology Associates, LLC  
propose that the following be included in the Record on Appeal:

1. Judgment entered on February 11, 2020
2. Verdict Forms, filed February 11, 2020
3. Order Approving Settlement, filed February 20, 2020
4. Form Order Denying Post-Trial Motions, filed on May 4, 2020
5. Form Order Denying the Defendant's Motion to Alter or Amend Judgment, filed on June 25, 2020

6. Order Granting Plaintiff's Motion to Consolidate Complaint
7. Complaint, filed October 28, 2016
8. Answer of Defendants to Complaint for Damages, filed November 14, 2016
9. Petition Seeking Approval of Settlement, filed February 19, 2020
10. Notice of Motion and Motion for Judgment Notwithstanding Verdict, or Alternatively, Motion for New Trial Absolute, or Alternatively, Motion for Reduction of Verdict and Set-Off, filed February 20, 2020
11. Plaintiff's Memorandum of Law in Opposition to Defendants Rock Hill Radiology Associates, LLC & Geoffrey T. Gilleland, MD's Motion for Judgment Notwithstanding the Verdict, or Alternatively, Motion for New Trial Absolute, or Alternatively, Motion for Reduction of Verdict/Set-Off, filed April 7, 2020
12. Defendants Gilleland and Rock Hill Radiology's Reply to Plaintiff's Opposition to Post-Trial Motions, filed April 17, 2020
13. Notice of Motion and Motion to Alter or Amend Order, filed May 5, 2020
14. Trial Transcript, February 3-7, 2020  
pp. 25-33, 72, 147-297, 301-341, 427-527, 531-634, 638-761
15. Deposition of Bruce Leonard, pp. 1-34
16. Plaintiff Ex. 1 – Bates numbered PMC-001 to PMC-064
17. Settlement Approval Hearing Transcript, February 2, 2020  
pp. 1-9
18. Motion Hearing Transcript, June 11, 2020  
pp. 1-12

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

LINDEMANN & DAVIS, P.A.

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

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Heyward, RN; South Carolina Emergency Physicians, LLC; Jonas Varaly,  
DO; Rock Hill Radiology Associates, LLC; and Geoffrey T. Gilleland, MD,  
..... Defendants,

Of Which, Rock Hill Radiology Associates, LLC, and Geoffrey T. Gilleland,  
MD are ..... Appellants.

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, the undersigned employee of Lindemann & Davis, P.A., counsel for the Appellants Rock Hill Radiology Associates, LLC and Geoffrey T. Gilleland, M.D., does hereby certify that service of the **Initial Brief of Appellants and Appellants' Designation Matter of Matter to be Included in the Record on Appeal** was made upon all counsel of record by email only this the 28th day of February 2022:

Via Email Only

Chad A. McGowan, Esquire  
Ashley White Creech, Esquire  
Eve S. Goodstein, Esquire  
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*s/ Andrew F. Lindemann*

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\*Also Admitted in North Carolina  
†Certified Mediator

February 28, 2022

**Via Email Only**

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

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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:

Pursuant to Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing the **Motion for Extension to File Initial Brief of Appellants**, the **Conditional Initial Brief of Appellants** and **Appellants' Designation Matter of Matter to be Included in the Record on Appeal** in the above referenced matter. In accordance with Section (d)(1) of this same Order, I am hereby serving copies on all counsel of record. I will mail the \$50.00 filing fee under separate cover.

If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosures

The Honorable Jenny Abbott Kitchings  
February 28, 2022  
Page Two

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cc: Chad A. McGowan, Esquire (*w/ Enclosures, Via U.S. Mail*)  
Ashley White Creech, Esquire (*w/ Enclosures, Via U.S. Mail*)  
Eve S. Goodstein, Esquire (*w/ Enclosures, Via U.S. Mail*)  
Matthew H. Henrikson, Esquire (*w/ Enclosures, Via U.S. Mail*)  
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