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Jun 14 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jean H. Toal, Circuit Court Judge
Charleston County

Case No. 2023-001733

Jian-Yun (John) Dong, M.D., Ph.DAppellant,

v.

Medical University of South CarolinaRespondent.

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

Respondent proposed the following be included in the record on appeal:

I. ORDERS

1. Order filed October 22, 2015.
2. Order filed December 14, 2016.
3. Order filed January 25, 2017.
4. Order filed June 20, 2019.
5. Order filed October 4, 2019.
6. Order filed October 6, 2021.
7. Order filed February 7, 2022.
8. Order filed April 7, 2022.

9. Order filed August 12, 2022.
10. Order filed September 8, 2022.
11. Order filed September 20, 2022.
12. Order filed September 28, 2022.
13. Order filed October 7, 2022.
14. Order filed November 23, 2022.
15. Order filed January 4, 2023.
16. Order filed January 31, 2023.
17. Order filed March 1, 2023.
18. Order filed March 21, 2023.
19. Notice filed April 20, 2023.
20. Notice filed May 8, 2023.
21. Notice filed May 8, 2023.
22. Order filed June 20, 2023.
23. Order Granting Summary Judgment filed July 17, 2023.
24. Order filed July 17, 2023.
25. Order filed September 22, 2023.
26. Order filed October 4, 2023.

II. PLEADINGS

1. Complaint filed September 2, 2014.
2. Answer filed December 28, 2016.
3. Plaintiff's Motion to Compel filed March 5, 2019.
4. Plaintiff's Motion to Expand Discovery filed January 29, 2020.

5. Plaintiff's Motion to Expand Discovery Schedule Due to COVID-19 Pandemics filed January 11, 2021.
6. Plaintiff's Second Motion to Compel for Production filed January 20, 2021.
7. Plaintiff's Motion to Amend Discovery Restrictions and Schedule.
8. Defendant's Response to Plaintiff's Second Motion to Compel and All Other Pleadings filed October 29, 2021.
9. Plaintiff's Reply to Defendant's Response to Motions to Expand and Compel filed November 24, 2021.
10. Plaintiff's Opposition to Defendant's Proposed Order, or Motion for Reconsideration filed February 3, 2022.
11. Plaintiff's Interlocutory Appeal of Magistrate Order to Restrict Discovery or Motion for Reconsideration filed March 8, 2022.
12. Defendant's Motion for Protective Order filed June 17, 2022.
13. Plaintiff's Opposition to Defendant's Motion for Protective Order filed June 30, 2022.
14. Plaintiff's Motion for Amendment of Scheduling Order filed August 23, 2022.
15. Plaintiff's Motion for Reconsideration filed August 23, 2022.
16. Plaintiff's Notice of Civil Appeal filed October 14, 2022.
17. Plaintiff's Motion for Protective Order filed December 21, 2022.
18. Plaintiff's Motion for Reconsideration or Renewed Request for Protective Order filed January 23, 2022.
19. Plaintiff's Motion for Extension of Time for Discovery filed February 22, 2022.
20. Defendant's Motion for Summary Judgment filed March 31, 2023.

21. Defendant's Memorandum in Support of Summary Judgment filed March 31, 2023.
22. Plaintiff's Motion for Extended Time for Response to Motion for Summary Judgment filed April 21, 2023.
23. Plaintiff's Opposition to Defendant's Motion for Summary Judgment filed April 24, 2023.
24. Plaintiff's Motion for Protective Order filed May 1, 2023.
25. Plaintiff's Motion for Continuance filed May 26, 2023.
26. Plaintiff's Motion for Rehearing on Plaintiff's Response in Opposition to Defendant's Motion for Summary Judgment filed June 27, 2023.
27. Plaintiff's Memorandum in Opposition to Summary Judgment file June 27, 2023.
28. Plaintiff's Motion for Amendment of Order Granting Defendant Summary Judgment filed July 28, 2023.
29. Defendant's Response to Plaintiff's Motion to Amend filed August 16, 2023.
30. Plaintiff's Reply to Defendant's Response to Plaintiff's Motion for Amendment filed September 28, 2023.
31. Plaintiff's Motion for Recusal Based On Appearance of Bias filed September 28, 2023.
32. Plaintiff's Notices of Appeal filed November 3, 2023, and November 27, 2023.

III. HEARING TRANSCRIPTS

1. Status Conference Hearing – October 4, 2022.
2. Summary Judgment Hearing – May 26, 2023.

I certify this Designation contains no matter that is irrelevant to the appeal.

Respectfully submitted,

s/ Bob J. Conley
Caroline Cleveland
Bob J. Conley
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, SC 29401
Telephone: (843)577-9626
Facsimile: (843)577-6672
ccleveland@clevelandlaborlaw.com
bconley@clevelandlaborlaw.com

Attorneys for Respondent

Charleston, South Carolina
Date: June 14, 2024

Others of Record:

John Dong, M.D., Ph.D.
Pro Se Plaintiff
71 Delahow Street
Charleston, SC 29492
T: (843) 991-2332
Email: johny.dong@me.com
johny.dong@gmail.com

Pro Se Appellant

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**PROOF OF SERVICE OF RESPONDENT'S DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

Caroline Cleveland
Bob J. Conley
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, SC 29401
Telephone: (843)577-9626
ccleveland@clevelandlaborlaw.com
bconley@clevelandlaborlaw.com

Attorneys for Respondent

I hereby certify that on June 14, 2024, I served a copy of Respondent's Designation of Matter on the following:

John Dong, M.D., Ph.D.
Pro Se Plaintiff
71 Delahow Street
Charleston, SC 29492
johny.dong@gmail.com
johny.dong@me.com

by email to both email addresses and by placing a copy of said document in the United States mail with sufficient postage thereon.

s/ Bob J. Conley
Caroline Cleveland
Bob J. Conley
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, SC 29401
Telephone: (843)577-9626
ccleveland@clevelandlaborlaw.com
bconley@clevelandlaborlaw.com

Attorneys for Respondent

Charleston, South Carolina
Date: June 14, 2024