

# WUKELA LAW FIRM

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January 3, 2025

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**SC Court of Appeals**

**via email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org) and Hand-Delivery**

Honorable Jenny Abbott Kitchings  
Clerk of Court - South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**Re: Qushon Inman, Appellant/Respondent**

**v.**

**GE Healthcare, Inc., Employer, and Riverstone International Ins.,  
Carrier, Respondents/Appellants**

**Appellate Case No.: 2024-001766**

Dear Ms. Kitchings:

I hope this letter finds you well.

As you are aware, I represent the Appellant/Respondent in the above-captioned matter.

I am, today, under separate cover, filing the Final Brief of the Appellant/Respondent. I have previously filed the Record on Appeal.

The Final Brief of the Appellant/Respondent completely briefs the issues raised in both the Appellant/Respondent's appeal and the cross-appeal.

Likewise, the Record on Appeal contains all matter designated by either party

in either the appeal or the cross-appeal.

The Respondents/Appellants, GE Healthcare, Inc. and Riverstone International Insurance, have filed an Initial Brief, and I expect they will be filing their Final Brief shortly.

The Respondents/Appellants' Brief only addresses the issues raised in the Appellant/Respondent's appeal. Appropriately, the Respondents/Appellants have filed a separate Initial Brief and Initial Designation of Matter in support of their cross-appeal.

Given that the Appellant/Respondent has fully briefed the issues in the appeal and cross-appeal in the Appellant/Respondent's Final Brief, I do not plan to refile that Brief, again, in response to the Respondents/Appellants' Initial Brief in support of their appeal.

Likewise, given the fact that the Respondents/Appellants have designated the same material in both the appeal and cross-appeal, and since the Appellant/Respondent does not seek to designate any additional matter outside of what has already been included in the Record on Appeal, I do not intend to make a second, duplicate, Designation. Nor do I believe that the Respondents/Appellants

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should be required to print a second, duplicate, Record in support of their appeal.

**Thus, in response to the cross-appeal, the Appellant/Respondent relies on the Final Brief of the Appellant/Respondent filed today.**

**Further, please allow the parties to rely on the Record on Appeal, previously filed, in both the appeal and cross-appeal.**

Kind regards,

Sincerely,

WUKELA LAW FIRM

STEPHEN J. WUKELA

SJW/tcc

cc: Nicolas Haigler, Esquire (via email: [nhaigler@robinsongray.com](mailto:nhaigler@robinsongray.com))