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Jun 20 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas
Maite Murphy, Circuit Court Judge

Appellate Case No. 2025-000108
Case No.: 2023-CP-38-00331

Serge R. Wandji.....Appellant,

v.

The Regional Medical Center.....Respondent,

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

Respondent The Regional Medical Center, by and through its undersigned counsel, proposes the following be included in the Record on Appeal:

1. Plaintiff’s Complaint filed on March 3, 2023.
2. Defendant’s Motion for Partial Dismissal filed on April 5, 2023.
3. Defendant’s Motion to Quash and for Protective order with exhibits, filed May 9, 2023.
4. Statement of Non-Appearance for the Deposition of Dr. John Samies dated May 12, 2023.
5. The circuit court’s Order granting Defendant’s Motion for Partial Dismissal, filed on June 22, 2023.
6. The circuit court’s Form 4 Order granting Defendant’s Motion to Quash and for Protective Order, filed on August 3, 2023.

7. Defendant's Motion to Compel Plaintiff's Written Responses to First Set of Interrogatories and Requests for Production, without exhibits, filed on May 7, 2024.
8. Plaintiff's Motion to Compel Discovery, without exhibits, filed on May 10, 2024.
9. Defendant's Opposition to Plaintiff's Motion to Compel and Motion for Protective Order, with Exhibits 3 and 4, filed on August 7, 2024.
10. Email from the circuit court ruling on the competing discovery motions, sent October 4, 2024.
11. The circuit court's Form 4 Order, filed on October 7, 2024.
12. Defendant's Motion for Summary Judgment, filed on September 24, 2024.
13. Plaintiff's Opposition to Motion for Summary Judgment, filed on September 26, 2024.
14. Plaintiff's second Opposition to Motion for Summary Judgment, filed on November 4, 2024.
15. Defendant's Memorandum in Support of the Motion for Summary Judgment, including all exhibits, filed on November 13, 2024.
16. Transcript from hearing on Defendant's Motion for Summary Judgment.
17. Plaintiff's third Opposition to Motion for Summary Judgment, with exhibits 6, 18a, filed on November 21, 2024.
18. The circuit court's electronic correspondence to the parties, granting Defendant's Motion for Summary Judgment, sent on December 16, 2024.
19. The circuit court's Order granting Defendant's Motion for Summary Judgment, filed on January 15, 2025.

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

Respectfully submitted,

s/Amanda C. Williams

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ATTORNEYS FOR RESPONDENT

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Charleston, South Carolina

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PROOF OF SERVICE

The undersigned hereby certifies that a copy of **RESPONDENT’S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** was served on Appellant, Serge R. Wandji this 20th day of June 2025, by electronic mail and U.S. mail, as follows:

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