

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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JAN 13 2016

APPEAL FROM SPARTANBURG COUNTY  
J. Mark Hayes, II, Circuit Court Judge

SC Court of Appeals

Case No. 2013-CP-42-2404

Lisa McKaughan, Individually and as the  
Personal Representative of the Estate of William Farr, ..... Appellant,

v.

Upstate Lung and Critical Care Specialists, P.C.; and  
Sau-Yin Wan, M.D., ..... Respondents.

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

The Respondents propose that the following be included in the Record on  
Appeal:

1. Defendants' Motion in Limine filed July 24, 2015

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

DAVIDSON & LINDEMANN, P.A.

BY:   
\_\_\_\_\_

ANDREW F. LINDEMANN  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

-AND-

ASHBY W. DAVIS  
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5 Hawthorne Park Court  
Greenville, South Carolina 29615  
(864) 335-3500

*Counsel for Respondents*

January 11, 2016

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Sau-Yin Wan, M.D., ..... Respondents.

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondents, does hereby certify that service of the **Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 11th day of January 2016:

William A. McKinnon, Esquire  
Jordan C. Calloway, Esquire  
McGowan, Hood & Felder, LLC  
1539 Healthcare Drive  
Rock Hill, South Carolina 29732

Ashby W. Davis, Esquire  
David L. Williford, II, Esquire  
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5 Hawthorne Park Court  
Greenville, South Carolina 29615



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DAVIDSON & LINDEMANN, P.A.

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†Certified Mediator

January 11, 2016

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Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

Of Counsel  
Kenneth P. Woodington

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

SC Court of Appeals

RE: Lisa McKaughan, Individually and as the Personal Representative of the Estate of William Farr v. Upstate Lung and Critical Care Specialists, P.C.; and Sau-Yin Wan, M.D.  
Appellate Case Number: 2015-001828  
Civil Action Number: 2013-CP-42-2404  
Our File Number: 359.9771

Dear Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the **Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me in the enclosed envelope.

By copy of this letter, I am serving copies on all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosures

The Honorable Jenny Abbott Kitchings  
January 11, 2016  
Page Two

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cc: (w/ Enclosures)

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