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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

R. Scott Sprouse, Circuit Court Judge

Case No. 2015-CP-46-00882  
Appellate Case No. 2016-002008

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APR 17 2017

SC Court of Appeals

Lorrie Dibernardo, individually and as the Personal Representative of the Estate of Anthony Dibernardo, deceased,..... Appellant,

v.

Carolina Cardiology Associates, PA and Naresh Mori, MD,..... Respondents.

**Designation of Matter  
to be included in the Record on Appeal**

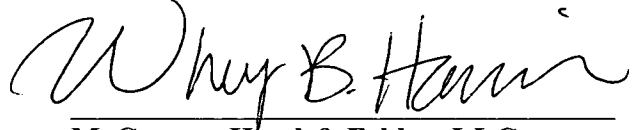
Appellant proposes the following be included in the Record on Appeal:

1. Notice of Intent;
2. Complaint;
3. Answer;
4. History and Physical-Dr. Shah (PMC 6-7)(Plaintiff's Exhibit 1);
5. History and Physical-Dr. Mori (PMC 3-5)(Plaintiff's Exhibit 2);
6. Cath Lab Report-Narrative-Dr. Mori (PMC 04043-0044)(Plaintiff's Exhibit 3);
7. Cath Lab Data/Timeline (PMC0045; 1-15)(Plaintiff's Exhibit 4);
8. Op Report-Dr. Savage (PMC033-35)(Plaintiff's Exhibit 5);
9. Consult- Dr. Wooten (PMC 008-10)(Plaintiff's Exhibit 6);
10. Consult-Dr. Erb (PMC 0011-0012)(Plaintiff's Exhibit 7)
11. Progress Notes (PMC 0015-0032)(Plaintiff's Exhibit 8);
12. Discharge/Death Summary-Dr. Mori (PMC0013)(Plaintiff's Exhibit 9);
13. Death Certificate (Plaintiff's Exhibit 10);
14. Fluoroscopy recordings (Plaintiff's Exhibit 11);
15. Pictures of dilator, introducer, sheath, and J. Wire (Plaintiff's Exhibit 13);
16. Jury Charge on Control of the Instrumentality (Court Exhibit 3);

17. Verdict Form;
18. Trial Transcript

Counsel certifies this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,



**McGowan, Hood & Felder, LLC**

April 7, 2017  
Columbia, SC

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**ATTORNEYS FOR APPELLANT**

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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v.

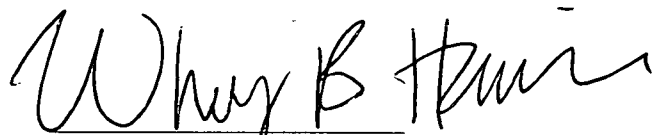
Carolina Cardiology Associates, PA and Naresh Mori, MD..... Respondents,

**PROOF OF SERVICE**

The undersigned hereby certifies that on April 7, 2017 she served counsel for Respondent with the *Initial Brief of Appellant and Designation of Matter for the Record on Appeal* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

George Beigley & Carmen Vaughn Ganjehsani  
P.O. Drawer 7788  
Columbia, SC 29202

Respectfully submitted,

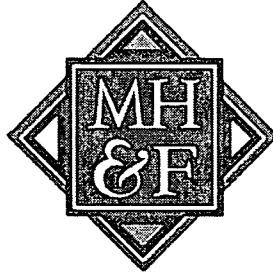
A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is written in a cursive style with a horizontal line underneath the name.

April 7, 2017  
Columbia, SC

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ATTORNEY FOR APPELLANT

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April 7, 2017

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

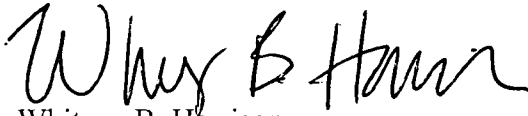
RE: *Lorrie Dibernardo v. Carolina Cardiology*  
Appellate Case No. 2016-002008

Dear Ms. Kitchings,

Please find enclosed for filing the original and one (1) copy of the *Initial Brief of Appellant* and *Designation of Matter to be included in the Record on Appeal* in regards to this case. I have also enclosed a proof of service of this document on counsel for Appellant. Please return the additional filed copies to me via ~~our courier~~ *mail - enclosed envelope*

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

With kind regards, I am

  
Whitney B. Harrison

Enclosures

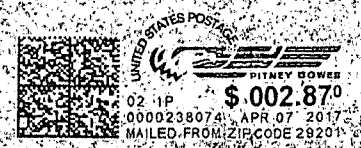
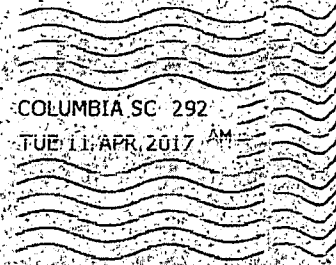
cc: George Cox Beighley, Esquire  
Carmen Vaughn Ganjehsani, Esquire

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**SC Court of Appeals**

MHE  
1517 Hampton St  
Columbia, SC 29201



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