

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM THE ADMINISTRATIVE LAW COURT
The Honorable H. W. Funderburk, Jr., Administrative Law Judge

JAN 13 2020
SC Court of Appeals

APPELLATE CASE No.: 2019-001159
ADMINISTRATIVE LAW COURT CASE No.: 18-ALJ-07-0100-CC

Trident Medical Center, LLC d/b/a Trident Medical Center.....Petitioner/Respondent,

v.

South Carolina Department of Health and Environmental Control
and Medical University Hospital Authority d/b/a MUSC Radiation Therapy Center
– Berkeley County Respondents,

Of Which Medical University Hospital Authority d/b/a MUSC Radiation
Therapy Center – Berkeley County is the.....Appellant.

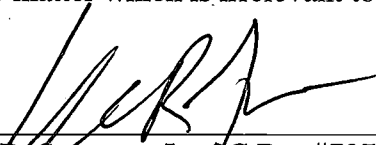
**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL OF
RESPONDENT TRIDENT MEDICAL CENTER, LLC D/B/A/ TRIDENT MEDICAL
CENTER**

In addition to that which Appellant and Respondent South Carolina Department of Health and Environmental Control propose to be included in the Record on Appeal, Respondent Trident Medical Center, LLC d/b/a Trident Medical Center proposes the following also be included in the Record on Appeal:

1. Respondent Trident Exhibit #16 (June 30, 2017 Financial Statement of MUHA)
2. Respondent Trident Exhibit #17 (June 30, 2016 Financial Statement of MUHA)
3. Respondent Trident Exhibit #18 (June 30, 2015 Financial Statement of MUHA)
4. Respondent Trident Exhibit #37 (June 30, 2018 Interim Financial Statement of MUHA)

5. Respondent Trident Exhibit #56 (June 30, 2018 Comprehensive Annual Financial Statement of MUSC – Organizational Chart)
6. Petitioner MUHA Exhibit #63 (Organizational Chart for Radiation Therapy Center)

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



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*Attorneys for Respondent
Trident Medical Center, LLC, d/b/a
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January 13, 2020

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and Medical University Hospital Authority d/b/a MUSC Radiation Therapy Center
– Berkeley County Respondents,

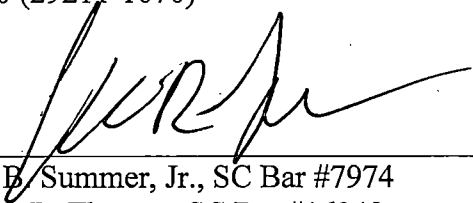
Of Which Medical University Hospital Authority d/b/a MUSC Radiation
Therapy Center – Berkeley County is the..... Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on January 13, 2020, he caused a copy of the
**DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL OF RESPONDENT
TRIDENT MEDICAL CENTER, LLC D/B/A TRIDENT MEDICAL CENTER** to be served upon all
parties of record by email and U.S. Mail addressed as follows:

Ashley C. Biggers, Esq.
Vito Wicevic, Esq.
South Carolina Department of Health
and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Daniel J. Westbrook, Esq.
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Atlanta, GA
Charleston, SC
Charlotte, NC
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Greenville, SC
Raleigh, NC
Spartanburg, SC
Washington, DC

January 13, 2020

RECEIVED
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VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

**Re: *Appellate Case No. 2019-001159
Trident Medical Center, LLC, d/b/a Trident Medical Center vs. South Carolina
Department of Health and Environmental Control and Medical University Hospital
Authority d/b/a MUSC Radiation Therapy Center – Berkeley County***

Dear Ms. Kitchings:

Pursuant to Rules 208 and 209, SCACR, enclosed for filing please find an original and one copy of Respondent Trident Medical Center, LLC d/b/a Trident Medical Center's Initial Brief and Designation of Matter to be included in the Record on Appeal with related certification, and Proofs of Service. Please return the file-stamped copies of the same to our courier.

As copied on this letter, and as evidenced by the Proofs of Service, we are providing copies of the same to all counsel of record. Should you have any questions regarding this matter, please do not hesitate to contact me.

With best regards, I am

Sincerely,

William R. Thomas

Enclosures

cc: Ashley C. Biggers, Esquire (*via U.S. mail and electronic mail*)
Vito Wicevic, Esquire (*via U.S. mail and electronic mail*)
Daniel J. Westbrook, Esquire (*via U.S. mail and electronic mail*)
Travis Dayhuff, Esquire (*via U.S. mail and electronic mail*)
A. Mattison Bogan, Esquire (*via U.S. mail and electronic mail*)
William C. Wood, Jr., Esquire (*via U.S. mail and electronic mail*)