

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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DEC 11 2020

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
Walton J. McLeod, Circuit Court Judge

Circuit Court Case No. 2018-CP-32-1750
Appellate Case No.: 2020-001089

Diane Connell Respondent,

v.

Lexington County Health Services District, Inc.
d/b/a Lexington Medical Center Appellants.

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

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

1. Order dated July 10, 2020;
2. Order dated July 31, 2020;
3. LMC's Motion to Deposit in Court;
4. Plaintiff's Memorandum in Opposition to LMC's Motion to Deposit;
5. Defendant's Reply Memorandum in Support of its Motion to Deposit;
6. Trial Transcript (Mar. 2, 2020);
7. Plaintiff's Trial Brief;
8. Defendant's Memorandum in Support of Motion for Directed Verdict;
9. Plaintiff's Exhibits 1-3 and 5-15;
10. Updated Medical and Billing Records filed April 6, 2020;
11. Deposition of James Loging, MD;
12. 30(b)(6) Deposition of Cory Andrews;
13. 30(b)(6) Deposition of Dale Thompson; and
14. Court Exhibit 1 (emails).

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

s/ Robert F. Goings

Robert F. Goings (SC Bar # 74855)

Jessica L. Gooding (SC Bar # 101210)

Goings Law Firm, LLC

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Attorneys for Respondent

Columbia, South Carolina

December 9, 2020

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d/b/a Lexington Medical Center Appellants.

PROOF OF SERVICE

I certify that I have served Respondent's Initial Brief and Respondent's Designation of Matter on Lexington County Health Services District, Inc. d/b/a/ Lexington Medical Center by depositing a copy of it in the United States Mail, postage prepaid, on December 9, 2020, addressed to its attorney of record, Evan Gessner, Esq. of Davis Frawley, LLC, Post Office Box 489, Lexington, South Carolina 29071.

[signature page to follow]

Respectfully submitted,

s/ Robert F. Goings

Robert F. Goings (SC Bar # 74855)

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Attorneys for Respondent

Columbia, South Carolina

December 9, 2020



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December 9, 2020

VIA UNITED STATES MAIL

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: Diane Connell v. Lexington County Health Services District, Inc. d/b/a Lexington
Medical Center
C/A No.: 2018-CP-32-1750
Appellate Case No.: 2020-001089

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of the Initial Brief of Respondent, Designation of Matter to be Included in the Record on Appeal and the Proof of Service in the above-referenced matter. Please return the filed, stamped copies of the documents to me in the envelope provided herein.

By copy of this letter, a copy of same is being forwarded for service on all counsel.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Robert F. Goings

rgoings@goingslawfirm.com

RFG:lcc

Enclosures

cc: Patrick J. Frawley, Esquire/Evan M. Gessner, Esquire

Goings Law Firm

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