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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Charleston County
Court of Common Pleas
The Honorable Debra R. McCaslin, Circuit Court Judge

Appellate Case No: 2021-000487

Trial Court Case No: 2020-CP-10-02902

Michelle Cha Holliman, individually, and as Personal Representative of
the Estate of Allen B. Holliman,

Respondent,

v.

We Are Sharing Hope SC, Medical University of South Carolina, United
Network for Organ Sharing, Jacqueline Honig, M.D., and Darla Welker,

Defendants,

Of which We Are Sharing Hope SC and United Network for Organ
Sharing are the

Appellants.

**Respondent's Designation of Matter To Be Included in the
Record on Appeal**

Respondent makes the following designation of matters to be included in the Record on
Appeal.

1. Order Granting Plaintiff's Motion to Compel and Denying We Are Sharing Hope's Motion for Protective Order (April 29, 2021)
2. Order Denying Sharing Hope Motion to Quash (July 24, 2020)
3. We Are Sharing Hope's Notice of Appeal (May 5, 2021)
4. UNOS Notice of Appeal (May 21, 2021)

5. Plaintiff's Motion for an Order Compelling Defendant WASH to File Documents Withheld From Discovery Under Seal and Provide Complete Responses (November 18, 2020)
6. We Are Sharing Hope's Memorandum in Opposition to Motion to Compel (March 12, 2021)
7. Plaintiff's Supplemental Memorandum in Support of Motion for Order Compelling WASH to File Documents (March 12, 2021)
8. WASH Reply to Plaintiffs Supplemental Memo in Support of Motion for an Order Compelling Docs (March 15, 2021)
9. We Are Sharing Hope's Motion for a Protective Order (December 15, 2020)
10. Email from WASH's counsel attaching WASH's Fourth Amended Privilege Log (April 13, 2021)
11. We Are Sharing Hope's Memorandum in Support of Motion for Protective Order (March 12, 2021)
12. Plaintiff's Response in Opposition to WASH's Motion for Protective Order (March 12, 2021)
13. WASH Reply to Plaintiffs Response in Opposition to WASH Motion for Protective Order (March 15, 2021)
14. Plaintiff's Motion to Compel Against We are Sharing Hope (February 5, 2021)
15. Hearing Transcript (April 13, 2021)
16. Plaintiff's Supplemental Memorandum in Support of Motion to Compel and in Opposition to WASH's Motion for Protective Order (Welker) (April 16, 2021)
17. Defendants WASH's Supplemental Memorandum in Opposition to Plaintiff's Motion to Compel (April 16, 2021)
18. UNOS' Mot. for a Protective Order/Mem. in Opp. to Pl.'s Mot. to Compel (August 16, 2021)
19. We Are Sharing Hope's Reply to Plaintiff's Supplemental Memorandum (April 19, 2021)
20. Email from Judge Cothran's Law Clerk (July 26, 2021)
21. Notice of Intent to Sue We Are Sharing Hope (July 17, 2019)
22. Amended Notice of Intent to Sue United Network for Organ Sharing and MUSC (April 7, 2020)

23. Second Amended Notice of Intent to Sue Adding Two Employees of We Are Sharing Hope (December 28, 2020)
24. Complaint (July 9, 2020)
25. We Are Sharing Hope's Amended Answer (August 12, 2020)
26. United Network for Organ Sharing's Motion to Dismiss (August 20, 2020)
27. Order Denying United Network for Organ Sharing's Motion to Dismiss (December 29, 2020)
28. United Network for Organ Sharing's Answer (November 22, 2020)

Respectfully submitted,

WYCHE, P.A.

s/John C. Moylan, III

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Attorneys for Respondent

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We Are Sharing Hope SC, Medical University of South Carolina, United
Network for Organ Sharing, Jacqueline Honig, M.D., and Darla Welker,

Defendants,

Of which We Are Sharing Hope SC and United Network for Organ
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Appellants.

PROOF OF SERVICE

This is to certify that I have this date caused to be served a true and correct copy of the
foregoing *Respondent's Initial Brief and Respondent's Designations of Matter to be Included
in the Record on Appeal* on counsel in this action by email, pursuant to the Supreme Court's Order
Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate
Court Rules dated August 25, 2021, by electronic mail, addressed as follows:

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Attorneys for Defendant United Network for Organ Sharing

Respectfully submitted,

WYCHE, P.A.

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Attorneys for Respondent

October 1, 2021

W Y C H E

Attorneys at Law

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SC Court of Appeals

Via E-Filing

October 1, 2021

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

RE: Michelle Cha Holliman, individually and as personal representative of the estate of Allen B. Holliman v. We Are Sharing Hope SC, Medical University of South Carolina, United Network for Organ Sharing, Jacqueline Honig, M.D., and Darla Welker
C/A No. 2020-CP-10-02902, Charleston CP
Appellate Case No. 2021-000487

Dear Ms. Kitchings:

Enclosed please find for filing with your office the Initial Brief, Designation of Matter to be Included in the Record on Appeal and Proof of Service on behalf of the Respondent Michelle Cha Holliman, individually and as Personal Representative of the Estate of Allen B. Holliman.

All counsel of record are being served with same via electronic mail.

Sincerely,



John C. Moylan, III
jmoylan@wyche.com

Enclosure

cc: Molly H. Craig, Esquire
Jean Marie Jennings, Esquire
Jack G. Gresh, Esquire
Lauren Spears Gresh, Esquire
Darren K. Sanders, Esquire
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