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**Jun 21 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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W.C.C. FILE No.: 1809996

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William D. Downes, Employee ..... Respondent,

v.

Bon Secours Health System, Inc., Employer,  
Safety National Casualty Corporation, Carrier, ..... Appellants.

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**AMENDED NOTICE OF APPEAL**

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Bon Secours Health System, Inc. and Safety National Casualty Corporation hereby appeal the Decision and Order of the Appellate Panel of the South Carolina Workers' Compensation Commission, filed June 8, 2022. Appellants received written notice of entry of the Commission's Decision and Order on June 8, 2022.

June 21, 2022

MCANGUS GOUDELOCK & COURIE, LLC

By: s/Helen F. Hiser

Helen F. Hiser  
S.C. Bar No.: 76124  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Appellants Bon Secours Health  
System, Inc. and Safety National Casualty  
Corporation*

Other Counsel of Record:

Donald E. Kamb, Jr., Esq.  
Williams & Kamb, LLC  
P.O. Box 10693  
Greenville, South Carolina 29603-0693  
(864) 235-6254

Joe Mooneyham, Esq.  
Mooneyham Berry, LLC  
Post Office Box 8359  
Greenville, South Carolina 29604  
(864) 421-0036  
*Attorney for Respondent William D. Downes*

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v.

Bon Secours Health System, Inc., Employer,  
Safety National Casualty Corporation, Carrier, ..... Appellants.

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**AMENDED PROOF OF SERVICE**

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I certify that I have served the Notice of Appeal on William D. Downes, by emailing it and depositing a copy of it in the United States Mail, postage prepaid, addressed to his attorney of record as follows:

Donald E. Kamb, Jr., Esq.  
Williams & Kamb, LLC  
P.O. Box 10693  
Greenville, South Carolina 29603-0693  
(864) 235-6254  
dkamb@williamskamb.com

Joe Mooneyham, Esq.  
Mooneyham Berry, LLC  
P.O. Box 8359  
Greenville, South Carolina 29604  
(864) 421-0036  
joe@mbllc.com

*Attorney for Respondent William D. Downes*

MCANGUS GOUDELOCK & COURIE, LLC

June 21, 2022

By: s/Helen F. Hiser

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S.C. Bar No.: 76124  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Appellants Bon Secours Health  
System, Inc. and Safety National Casualty  
Corporation*



**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

June 21, 2022

Amy Bracy, Judicial Director  
South Carolina Workers' Compensation Commission  
Post Office Box 1715  
Columbia, South Carolina 29202-1715

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SC Court of Appeals

RE: William Downes v. Bon Secours Mercy Health and Bon Secours Health System, Inc. c/o Cannon Cochran Management Services, Inc.  
Date of Accident: April 17, 2018  
WCC File No.: 1809996  
Our File No.: 2024.22054  
Claim No.: 18J28K142496  
Appeal No.: 2022-

Dear Ms. Bracy:

Please find enclosed for filing the original and one (1) copy of our Amended Notice of Appeal in the above-captioned case. I would appreciate your returning a clocked-in copy of the same to me in the envelope provided.

By copy of this letter, I am serving counsel of record with the above-referenced Notice of Appeal.

Thanking you in advance for your assistance, I am

Very truly yours,

Helen F. Hiser

Enclosures

cc: The Honorable Jenny Abbott Kitchings, S.C. Court of Appeals  
Donald E. Kamb, Jr., Esq.  
Joe Mooneyham, Esq.



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Jun 21 2022

SC Court of Appeals

**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

June 21, 2022

**Via Court E-filing & U.S. Mail**

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

RE: William Downes v. Bon Secours Mercy Health and Bon Secours Health System, Inc. c/o Cannon Cochran Management Services, Inc.  
Date of Accident: April 17, 2018  
WCC File No.: 1809996  
Our File No.: 2024.22054  
Claim No.: 18J28K142496  
Appeal No.: 2022-

Dear Ms. Kitchings:

Enclosed for filing are an Amended Notice of Appeal in the above-referenced matter. Also, enclosed are the following:

1. a copy of the Amended Proof of Service of the Notice of Appeal on Respondent;
2. a copy of the Order being appealed; and,
3. a copy of our amended correspondence to the South Carolina Workers' Compensation Commission.

Our Check in the amount of \$250.00 will be mailed to the Court separately along with a copy of this letter.

Please let us know if you have any questions. Thanking you in advance for your assistance, I am

Yours truly,

Helen F. Hiser

Enclosures

cc: Workers' Compensation Commission  
Donald E. Kamb, Jr., Esq.  
Joe Mooneyham, Esq.

**McANGUS GOUDELICK & COURIE LLC**

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