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Aug 29 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM
THE WORKERS' COMPENSATION COMMISSION

SCWCC Case No. 1809996
Court of Appeals Case No. 2022-000864

William D. Downes, Employee, Respondent,

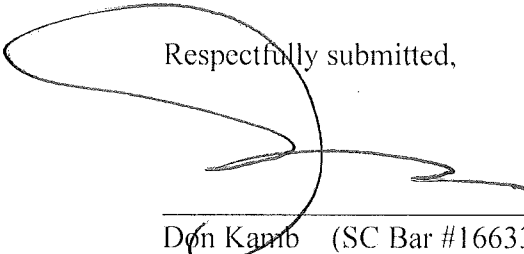
vs.

Bon Secours Mercy Health, Inc., Employer, and
Safety Nat'l Cas. Corp., Carrier, Appellants.

**RESPONDENT'S REPLY TO RETURN IN
OPPOSITION TO MOTION TO COMPEL**

Respondent Danny Downes hereby withdraws the motion to compel filed in this court on August 18, 2022. He will refile the motion with the Workers' Compensation Commission in accordance with the Workers' Compensation Act, the Commission's rules and regulations, and Rule 241(d), SCACR.

Respectfully submitted,



Don Kamb (SC Bar #16633)
Williams & Kamb, LLC
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Greenville, SC 29603
(864) 235-6254
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Attorney for Respondent

Dated _____
Greenville, South Carolina

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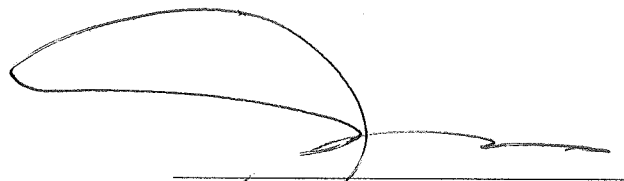
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PROOF OF SERVICE

I certify that I have served the **RESPONDENT'S REPLY TO RETURN IN OPPOSITION TO MOTION TO COMPEL** on the below-named attorney of record for appellants by forwarding copies electronically to the addresses shown on 8/27/22, as follows:

Helen F. Hiser, Esq.
McAngus Goudelock & Courie, LLC
by e-mail to helen.hiser@mgclaw.com



Don Kamb (SC Bar #16633)
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Attorney for Respondent