

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

Sep 16 2022

APPEAL FROM THE SOUTH CAROLINA
Workers' Compensation Commission Full Appellate Panel

SC Court of Appeals

Appellate Case No. 2022-000067

KYLE R. BAGLEY, Employee..... Appellant,

v.

JN FIBERS, INC., D/B/A SUN FIBER, LLC, Employer, and
GREAT AMERICAN INSURANCE COMPANY, Carrier..... Respondents.

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

Respondents propose the following be included in the Record on Appeal:

1. Order of the Appellate Panel of the Full Commission, dated December 21, 2021
2. Transcript of the Hearing before the Appellate Panel on August 30, 2021
3. Form 30 (Defendants') Request for Commission Review, filed May 25, 2021
4. Defendants' Brief to the Full Commission, filed July 28, 2021
5. Claimant's Brief to the Full Commission, filed August 12, 2021
6. Defendants' Reply to Claimant's Brief, filed August 20, 2021
7. Order of the Hearing Commissioner, dated May 13, 2021
8. Transcript of the Hearing before the Hearing Commissioner on September 28, 2020
9. Claimant's APA Submissions, pages 1-379 (to include the complete deposition transcripts of Dr. Matthew Brown, Dr. David DuPuy, Dr. Hermanth Rao, and Dr. Brett Gunter).
10. Defendant's APA Submissions, pages 353-461
11. Defendant's Exhibit 3 from Hearing on September 26, 2020 (surveillance video of accident)
12. Form 21 (Defendants'), file September 17, 2019
13. Form 50 (Claimant's), filed October 16, 2019
14. Form 51 (Defendants'), filed November 15, 2019

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

September 16, 2022



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ATTORNEYS FOR RESPONDENTS

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COMPENSATION COMMISSION

SC Court of Appeals

Appellate Case No. 2022-000067

KYLE R. BAGLEY, Employee,.....

Appellant,

v.

JN FIBERS, INC., D/B/A SUN FIBER, LLC, Employer, and
GREAT AMERICAN INSURANCE COMPANY, Carrier,.....

Respondents.

PROOF OF SERVICE

I certify that I have served the **INITIAL BRIEF OF RESPONDENT** and **DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** by depositing a copy of it in the United States Mail, postage prepaid, on September 16, 2022, addressed to the Appellant's Attorney of Record, Bryan N. Sanchez, Esq., Lewis Law Firm, LLC, PO Box 11583, Rock Hill, South Carolina 29731 and via email at bryan.sanchez@stacylewislaw.com.

HOLDER PADGETT
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VIA US-MAIL AND EMAIL TO:

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina Court of Appeals
Calhoun Building
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

Re: Kyle R. Bagley v. Sun Fiber, LLC, and Great American Alliance Insurance Company
Appellate Case No.: 2022-000067
Date of Accident: June 14, 2019

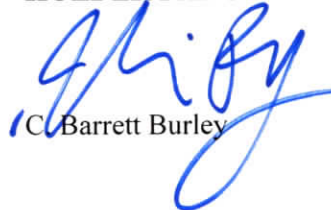
Dear Ms. Kitchings:

Enclosed for filing are the **INITIAL BRIEF OF RESPONDENT** and **DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** in the above-referenced case, along with a **PROOF OF SERVICE** that a copy was served on the Appellant (via their Counsel of Record Bryan N. Sanchez, Esquire).

If you have any questions, or if you need further assistance from us, please do not hesitate to call.

Respectfully,

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC



C. Barrett Burley

CBB/swk

Enclosures

cc: Liz Hsu, JN Fibers Inc d/b/a Sun Fiber, LLC (via email)
Liwen Feng, JN Fibers Inc d/b/a Sun Fiber, LLC (via email)
Dong Jiang, JN Fibers Inc d/b/a Sun Fiber, LLC (via email)
Amado Azua Jr., JN Fibers Inc d/b/a Sun Fiber, LLC (via email)
Bryan N. Sanchez, Esquire, Lewis Law Firm (via email and US-Mail)
Tearsa D. White, Strategic Comp (via fax)