

**RECEIVED**

**Oct 12 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

---

Appellate Case No. 2022-000655  
WCC File No. 0100434

---

Emitt R. Gunnells, Employee .....Appellant,

v.

Galey & Lord Industries, Employer and  
Arrowpoint Capital Corporation, Carrier.....Respondents,

---

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

---

Respondents, Galey & Lord Industries and its workers' compensation insurance carrier,  
Arrowpoint Capital Corporation, propose the following be included in the record on appeal:

1. Letter from Kathy Dean, Claims Examiner of the South Carolina Workers' Compensation Commission, calculating value of award and attorney's fees dated August 11, 2003.
2. Form 61 or Attorney Fee Petition, dated September 23, 2003.
3. Motion to Approve Commuted Lump Sum Payment of Attorney's Fees by Appellant's attorney, dated August 13, 2003.
4. Regulation 67-1603.
5. Exhibits to Hearing Commissioner's order dated August 16, 2021.

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

Respectfully submitted,



---

VERNON F. DUNBAR  
MCANGUS GOUDELOCK & COURIE, L.L.C.  
Post Office Box 2980  
55 East Camperdown Way, Suite 300  
Greenville, South Carolina 29602  
(864) 239-4000  
Attorneys for Respondents

Greenville, South Carolina  
October 12, 2022

**RECEIVED**

**Oct 12 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

---

Appellate Case No. 2022-000655  
WCC File No. 0100434

---

Emitt R. Gunnells, Employee .....Appellant,

v.

Galey & Lord Industries, Employer and  
Arrowpoint Capital Corporation, Carrier.....Respondents,

---

**PROOF OF SERVICE**

I hereby certify that I have this 12th day of October 2022, caused to be served a copy of Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal by electronic transmission a copy of same as follows:

Stephen J. Wukela, Esquire  
Wukela Law Firm  
PO Box 13057  
Florence, SC 29504-3057

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Respectfully submitted,



---

VERNON F. DUNBAR  
MCANGUS GOUDELOCK & COURIE, L.L.C.  
Post Office Box 2980  
55 East Camperdown Way, Suite 300  
Greenville, South Carolina 29602  
(864) 239-4000  
Attorneys for Respondents

Reply To  
VERNON F. DUNBAR  
Direct Dial: (864) 239-6735  
vernon.dunbar@mgclaw.com

**RECEIVED**

**Oct 12 2022**

**SC Court of Appeals**

October 12, 2022

VIA EMAIL

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Emitt R. Gunnells v. Galey & Lord Industries and Arrowpoint Capital Corp.  
Date of Accident: January 14, 2001  
Appellate Case No. 2022-000655  
Our File No.: 20113.11004

Dear Ms. Kitchings:

Please find enclosed for filing the original copy of Respondents' Initial Brief and Designation Of Matter To Be Included In The Record On Appeal in the above-referenced matter. I am also enclosing the required Proof of Service.

By copy of this letter to Stephen J. Wukela, Esquire, Attorney for Emitt Gunnells, Appellant, I am providing him with a copy of the Initial Brief and apprising him of this communication with the Court.

Very truly yours,



Vernon F. Dunbar

VFD/tls  
Enclosures

cc: Stephen J. Wukela, Esquire, Wukela Law Firm  
Barbara Myers, Arrowpoint Capital Corp  
Letty Smith, Galey & Lord Industries