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**Nov 02 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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SCWCC FILE NO. 1824344

APPELLATE CASE NO. 2022-001153

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Zachary Brown, Claimant, Respondent,

v.

Southeastern Services, H.H.I., LLC, Employer, and Uninsured Employers' Fund, Carrier,  
Defendants,

of which Uninsured Employers' Fund is the Appellant.

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**APPELLANT FUND'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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The Appellant Fund respectfully proposes that the following matter be included in the Record on Appeal pursuant to the provisions of Rule 209, SCACR.

1. Order of Commissioner Campbell, dated February 18, 2022;
2. Fund's Form 30, dated March 1, 2022;
3. Order of the Appellate Panel, dated July 20, 2022;
4. Claimant's APA Submissions, pp. 121 – 409;
5. Employer's APA Submissions, pp. 1 – 148;
6. Transcript of Deposition of Daniel Smith, dated July 1, 2020;
7. Transcript of Hearing Before Commissioner Campbell;
8. Transcript of Hearing Before the Appellate Panel of the Full Commission.

November 2, 2022



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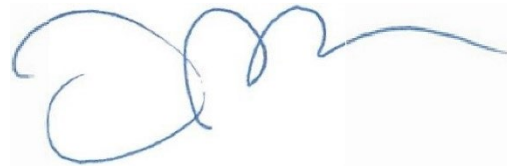
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**CERTIFICATE OF COUNSEL**

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I hereby certify on this 2<sup>nd</sup> day of November 2022, that the Appellant Fund's Designation of Matter to be Included in the Record on Appeal contains no matter which is not relevant to the appeal.

November 2, 2022



---

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W.C.C. File No. 1824344

Appellate Case No. 2022-001153

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v.

Southeastern Services, H.H.I., LLC, Employer, and Uninsured Employers' Fund, Carrier,  
Defendants,

of which Uninsured Employers' Fund is the Appellant.

**PROOF OF SERVICE**

I hereby certify that I have served Appellant Fund's Initial Brief and Designation of Matter to be included in the Record on Appeal of the attorneys for all other parties by electronic mail on November 2, 2022, as follows:

Joshua R. Fester, Esquire  
[jfester@johnsonslawoffice.com](mailto:jfester@johnsonslawoffice.com)

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November 2, 2022

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**VIA EMAIL** – [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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

Re: **Appellate Case No. 2022-001153**  
Zachary Brown, Claimant, Respondent,  
v.  
Southeastern Services H.H.I., LLC, Employer, and Uninsured Employers' Fund, Carrier,  
Defendants,  
of which Uninsured Employers' Fund is the Appellant.

Dear Ms. Kitchings:

Enclosed for filing in the above referenced case please find Appellant Fund's Initial Brief, Designation of Matter; and Certificate of Counsel.

Respectfully,

**HOLDER PADGETT LITTLEJOHN + PRICKETT**



Michelle A. Adams  
Paralegal to Timothy B. Killen

TBK/maa  
Enclosures

cc: Joshua Fester, Esquire (via email)  
Michael P. Bennett, Esquire (via email)  
Amy Bracy, SC WCC Judicial Director (via email)  
Jarrid Alexander (via email)