

DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA

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In the Court of Appeals

NOV 10 2022

SC Court of Appeals

APPEAL FROM SOUTH CAROLINA WORKERS' COMPENSATION
COMMISSION

FULL COMMISSION

Appellate Case No.: 2022-001546

Monica Murphy,
Claimant.....Appellant,

v.

Halocarbon Products Corporation, Employer, and Commerce & Industry Insurance
Company c/o AIG Claims, Inc., Carrier.....Respondents.

Appellant files this Designation of Matter to be Included in the Record on Appeal pursuant to the South Carolina Supreme Court pursuant to Rule 209 and 210 (c) S.C.A.C.R. Appellant desires to include the following content in the Record on Appeal.

1. Decision and Order of Appellate Panel, filed October 18, 2022
2. Decision and Order of Commissioner Susan S. Barden, filed March 12, 2018
3. Appellate Panel Decision and Order filed July 23, 2018
4. Form 50 of September 11, 2015
5. Amended Form 50 of November 14, 2016
6. Form 51 of October 9, 2015
7. Amended Form 50, Certificate of Service only, December 5, 2016
8. Form 51 of January 5, 2017
9. Form 58 (Pre-Hearing Brief) and list of APA submissions of February 20, 2017
10. Form 58 (Pre-Hearing Brief) and list of APA submissions of February 27, 2017
11. Form 58 (Pre-Hearing Brief) and list of APA submissions of April 12, 2017
12. Claimant's Supplemental Notice of Witnesses and Written Medical Reports to be Introduced as Direct Evidence on Behalf of Claimant, dated April 20, 2017

13. Claimant's Second Supplemental Notice of Witnesses and Written Medical Reports to be Introduced as Direct Evidence on Behalf of Claimant, dated April 26, 2017
14. Form 30, as amended on March 28, 2018
15. Respondents' Brief to the Full Commission, dated May 25, 2018
16. Hearing Transcript of April 27, 2017
 - Direct Examination by Mr. Hall (Monica Murphy)– pages 5-7, 9, 14-27, 29-49, 51-68, 70, 73
 - Cross Examination by Mr. Lichty (Monica Murphy) – pages 76-79, 84-87, 89, 91, 101-106, 108-111
 - Direct Examination by Mr. Hall (Todd Lawrence) – pages 115, 118-122
 - Cross Examination by Mr. Lichty (Todd Lawrence) – pages 122, 127, 129-131
 - Direct Examination by Mr. Lichty (Ken McDowell)– pages 135, 139-149, 151-155
 - Cross Examination by Mr. Hall (Ken McDowell) – pages 155-156, 165-170
 - Re-direct Examination by Mr. Lichty (Ken McDowell) – pages 170-171,
 - Direct Examination by Mr. Lichty (George D. Campbell, III)- pages 173-177
 - Cross Examination by Mr. Hall (George D. Campbell, III) – page 177
 - Direct Examination by Mr. Lichty (Lonnie Parsons) – pages 184-189
 - Cross Examination by Mr. Hall (Lonnie Parsons) – pages 189, 194
 - Re-direct Examination by Mr. Lichty (Lonnie Parsons) – page 196
17. Deposition Transcript of Michael A. MacKinnon, MD
 - Direct Examination by Mr. Hall pages 10-13, 16-19, 22-23, 26-27, 29-30, 35-37, 40-43
 - Cross Examination by Mr. Lichty pages 55-56, 60-61
 - Re-direct Examination by Mr. Hall pages 61-66
 - Signature pages, etc. pages 67-73
18. Deposition Transcript of Kellie Lane, MD
 - Direct Examination by Mr. Hall pages 5, 8-9, 11, 15-18, 20
 - Direct Examination by Mr. Lichty pages 20-23, 25-26, 34, 49
19. Deposition Transcript of Monica Murphy
 - Direct Examination by Mr. Lichty page 9, 44, 46, 59-60, 66-67, 71-72, 86, 96, 102-103, 108
20. Deposition Transcript of William F. Alleyne, MD
 - Direct Examination by Mr. Hall pages 8-9, 12-17, 27
 - Examination by Mr. Lichty pages 33-36, 38-40
21. Deposition Transcript of Patrick Aquilina, MD
 - Direct Examination by Mr. Lichty pages 4-10, 12-14
 - Cross Examination by Mr. Hall pages 17-19
22. Deposition Transcript of John Mitchell, MD
 - Direct Examination by Mr. Hall pages 5-7, 9, 12, 20, 28-29, 32-33
 - Direct Examination by Mr. Lichty pages 44-47
 - Re-examination by Mr. Hall page 51

- Re-examination by Mr. Lichty pages 51-52
23. Claimant's Exhibit 2 to the Deposition Transcript of Michael A. MacKinnon, MD
24. Claimant's APAs – Pages 5-19, 21-62, 65-66, 125-155, 162-163, 165-167, 169,
179, 181-185, 197, 201, 204, 217, 222, 238-242, 268-270, 289-302, 475-482
25. Defendant's APAs – Pages 391-425, 433-459

In accordance with Rule 209 (c) S.C.A.C.R., the undersigned counsel for the Appellant certifies that this Designation contains no matter which is irrelevant to the appeal.



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The Rick Hall Law Firm, LLC
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S.C. Bar No. 2591
Attorney for Appellant

November 9, 2022

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Monica Murphy,)
)
 Claimant,)
)
 Appellant,)
)
 v.)
)
 Halocarbon Products Corporation,)
)
 Employer, and)
)
 Commerce & Industry Insurance)
 Company c/o AIG Claims, Inc.,)
)
 Carrier,)
)
 Respondents.)

Appellate Case No: 2022-011546

CERTIFICATE OF SERVICE

The undersigned paralegal to The Rick Hall Law Firm, LLC does hereby certify that he has served a copy of Appellant's Designation of Matter to be Included in the Record on Appeal in the above matter upon the individuals(s) at the address(s) listed below by delivering a copy of the same via the U.S. mail, postage prepaid, and email as indicated to:

Via US Mail & Email

James Lichty, Esquire
McAngus, Goudelock & Courie, LLC
1320 Main Street
Meridian, 10th Floor
Columbia, SC 29201
jlichty@mgclaw.com

Via US Mail

The South Carolina Workers' Compensation Commission
Attention: Judicial Department
Post Office Box 1715
Columbia, SC 29202-1715



Christine Mason Spurgeon
Paralegal to Frederick I. Hall, III, Esq.

STATE OF SOUTH CAROLINA

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APPEAL FROM SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Appellate Case No.: 2022-001546

Monica Murphy, Employee.....Appellant,
v.

Halocarbon Products Corporation, Employer, and Commerce & Industry Insurance Company c/o
AIG Claims, Inc., Carrier.....Respondents.

PROOF OF SERVICE

I certify that I have served the Designation of Matter to be Included in the Record on Appeal by emailing a copy and depositing a copy in the U. S. Mail, postage prepaid, on November 9, 2022, addressed to the attorney of record at the addresses listed below:

James Lichty, Esquire
McAngus, Goudelock & Courie, LLC
1320 Main Street
Meridian, 10th Floor
Columbia, SC 29201
jlichty@mgclaw.com
Attorney for Respondent



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Rick Hall
rick@sctrialattorneys.com

Vic Harrelson
vic@fihall-ltc.com

November 9, 2022
Via U. S. Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court
Court of Appeals
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: Monica Murphy, Claimant, Appellant, v. Halocarbon Products Corporation, Employer, and Commerce & Industry Insurance Company c/o AIG Claims, Inc., Carrier, Respondents, Case No. 2022-001546

Dear Ms. Kitchings:

Enclosed please find the original and a copy of the Designation of Matter to be Included in the Record on Appeal and Proof of Service in the above captioned matter. Please file all the enclosed originals and return the filed, stamped copies to this office in the enclosed self-addressed, stamped envelope for your convenience.

By copy of this letter, I am also serving a copy of the same upon James Lichty, Esquire, Attorney for Respondents and the South Carolina Workers' Compensation Commission.

Should you have any questions regarding this matter, please feel free to contact me at my Lexington office.

Yours truly,



Frederick I. Hall, III


FIH,III/cms
Enclosures

Cc: James Lichty, Esquire
Judicial Department of S.C. Workers' Compensation Commission
Monica Murphy



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Lexington, South Carolina 29071



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The Honorable Jenny Abbott Kitchings **NOV 10 2022**
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