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Dec 05 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appeal No.: 2022-000864

William D. Downes, Employee Respondent,

v.

Bon Secours Mercy Health, Inc., Employer,
Safety National Casualty Corporation, Carrier, Appellants.

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

Appellants Bon Secours Mercy Health, Inc. and Safety National Casualty Corporation propose the following be included in the Record on Appeal:

1. Full Commission Decision and Order, filed June 8, 2022;
2. Single Commissioner Order, filed Oct. 22, 2021;
3. Motion Order filed Nov. 4, 2021;
4. Motion Order filed Nov. 8, 2021
5. Form 50, dated Feb. 26, 2021;
6. Form 51, dated March 26, 2021;
7. Form 21, dated May 19, 2021;
8. Claimant's Motion for Reconsideration, dated Oct 25, 2021;
9. Defendants' Motion for Reconsideration, dated Oct. 27, 2021;
10. Form 30, dated Nov. 5, 2021;

11. Form 30, dated Nov. 9, 2021;
12. Claimant's Brief of A[p]pellant, dated Dec. 22, 2021;
13. Defendant-Appellant's Brief to the Appellate Panel, dated Dec. 23, 2021;
14. Defendant-Respondent's Brief to the Appellate Panel, dated Jan. 6, 2022;
15. Claimant's Brief of Respondent, dated March 7, 2022;
16. Defendant-Appellant's Rely Brief, dated March 17, 2022;
17. Claimant's APAs, dated July 28, 2021; and
18. Defendants' APAs, dated August 2, 2021;
19. Transcript of Hearing held August 12, 2021; and,
20. Transcript of Hearing held September 2, 2022.

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

December 5, 2022

McANGUS GOUDELOCK & COURIE LLC

s/ Helen F. Hiser

Helen F. Hiser

S.C. Bar No.: 76124

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*Attorneys for Appellants Bon Secours Mercy
Health, Inc. and Safety National Casualty
Corporation*

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William D. Downes, Employee Respondent,

v.

Bon Secours Health System, Inc., Employer,
Safety National Casualty Corporation, Carrier, Appellants.

PROOF OF SERVICE

I certify that I have served the **Initial Brief of Appellants** and Appellants' **Designation of Matter** on William D. Downes, by emailing it to his attorneys of record as follows:

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December 5, 2022

By: s/Helen F. Hiser

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Reply To

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SC Court of Appeals

Via S.C. Courts E-filing

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: William Downes v. Bon Secours Mercy Health and Bon Secours Health System, Inc. c/o Cannon Cochran Management Services, Inc.
Date of Accident: April 17, 2018
WCC File No.: 1809996
Our File No.: 2024.22054
Claim No.: 18J28K142496
Appeal No.: 2022-000864

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

1. the original of the Initial Brief of Appellants;
2. the original of the Designation of Matter to be Included in the Record on Appeal; and,
3. Appellants' Proof of Service concerning items one and two.

Please let us know if you have any questions concerning the attached or need anything further from us.

Sincerely,
McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Donald E. Kamb, Jr., Esq. (via email only)
Joe Mooneyham, Esq. (via email only)

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