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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.

CERTIFICATE OF COUNSEL

The undersigned certifies that this final Brief of Appellants Bon Secours Mercy Health, Inc. and Safety National Casualty Corporation complies with Rule 211(b), SCACR. The undersigned also certifies that this Brief of Appellants complies with the South Carolina Supreme Court's April 16, 2014 Order re: Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings.

April 11, 2023

MCANGUS GOUELOCK & COURIE, LLC

s/Helen F. Hiser

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*Attorneys for Appellants Bon Secours Health
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Corporation*

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CERTIFICATE OF COUNSEL

The undersigned certifies that this final Reply Brief of Appellants Bon Secours Mercy Health, Inc. and Safety National Casualty Corporation complies with Rule 211(b), SCACR. The undersigned also certifies that this Reply Brief of Appellants complies with the South Carolina Supreme Court's April 16, 2014 Order re: Revised Order Concerning Personal Identifying Information and Other Sensitive Information in Appellate Court Filings.

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PROOF OF SERVICE

I certify that I have served the **Certificates of Counsel** for the final Brief of Appellants and Reply Brief of Appellants on William D. Downes, by emailing them to his attorneys of record as follows:

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April 11, 2023

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Reply To

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Via S.C. Courts E-Filing & U.S. Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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 originals of the Certificates of Counsel for the final Brief and Reply Brief of Appellants Bon Secours Mercy Health Inc. and Safety National Casualty Corporation. Opposing counsel are being served via email.

Very truly yours,

Helen F. Hiser

Enclosures

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