

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

69163

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

W.C.C. File No. 0810152

Patricia Fore, Employee, Appellant,

v.

Griffco of Wampee, Inc., Employer, and
Chartis Claims, Inc., Carrier. Respondents.

**MOTION TO CORRECT
THE RECORD ON APPEAL**

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SC Court of Appeals

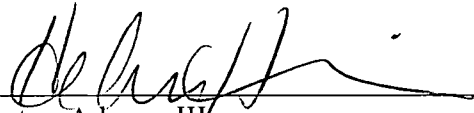
Pursuant to Rules 209, 210 and 240, SCACR, Respondents Griffco of Wampee, Inc. and Commerce and Industry Insurance Company, c/o Chartis Claims, Inc. move this Court to order that the Record on Appeal as filed and served by Appellant Patricia Fore be corrected. Appellant has failed to include evidence of record that was properly designated by Respondents.

The disc attached to page 385 of the Record on Appeal is only part of the hearing exhibit designated by Respondents and admitted as hearing exhibit no. 3 by the Single Commissioner. (See Exh. A, p. 3, describing Respondents' exhibit number 3 as "Surveillance Video, consisting of 2 discs"; and Exh. A p. 13, indicating "surveillance footage also showed Claimant squatting, bending, and lifting in a manner well-exceeding her self-reported limitations"). Respondents request that this Court order Appellant to include the second surveillance disc, including

recordings of Appellant shopping at WalMart and getting in and out of her vehicle numerous times, in the Record on Appeal.

Respectfully submitted,

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July 18, 2013

Exhibit A

SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

W.C.C. FILE NO.: 0810152

PATRICIA FORE,

Employee,

Claimant,

vs.

GRIFFCO OF WAMPEE, INC.,

Employer,

AND

COMMERCE & INDUSTRY INSURANCE
COMPANY c/o CHARTIS CLAIMS, INC.,

Carrier,

Defendants.

DECISION AND ORDER

DATE OF HEARING: Hearing held in Horry County, S.C. on September 27, 2011.

APPEARANCES: Claimant appeared and represented by Stephen B. Samuels, Esquire of Samuels Law Firm of Columbia, South Carolina.

Defendants represented by James H. Lichty, Esquire of McAngus Goudelock & Courie, L.L.C. of Columbia, South Carolina.

PURPOSE OF THE HEARING: To determine all issues as set forth in Forms 50 and 51.

COMMISSIONER: Commissioner G. Bryan Lyndon

FILED: January 18, 2012

STIPULATIONS

1. Venue was proper in Myrtle Beach, South Carolina.
2. At the time of the alleged injury, Claimant earned an average weekly wage of \$449.36 with a corresponding compensation rate of \$299.59.
3. Notice of hearing was timely and properly served upon all parties of interest.
4. The South Carolina Workers' Compensation Commission has jurisdiction of this claim.
5. The Commission File becomes part of the record with the exception of self-serving declarations and unstipulated medical reports.

APA SUBMISSIONS

Pursuant to the South Carolina Administrative Procedures Act and Regulations of the South Carolina Workers' Compensation Commission, the following records and documents were submitted into evidence.

The Claimant submitted the following exhibits:

1. Loris Healthcare – Seacoast Medical Center, dated 02/24/2008, consisting of 5 pages. (APA 1)
2. Orthopaedic Associates f/k/a Albany Bone & Joint Clinic, dated 09/16/2008 to 02/14/2011, consisting of 73 pages. (APA 2)
3. Strand Regional Specialty Associates, dated 05/08/2008, consisting of 9 pages.
(APA 3)
4. Phoebe Putney Memorial Hospital, dated 11/17/2008 to 12/05/2008, consisting of 4 pages. (APA 4)
5. Midlands Orthopaedics, dated 07/07/2009, consisting of 2 pages. (APA 5)

The Defendants submitted the following exhibits:

1. Correspondence from S.C. Attorney General's Office, dated 07/20/2011, consisting of 4 pages. (Exhibit 1) *Page one is omitted as per Claimant's objection.*
2. *Omitted as per Claimant's objection.*
3. Surveillance Video, consisting of 2 discs. (Exhibit 3)
4. Surveillance photograph of Claimant's vehicle, consisting of 1 page. (Exhibit 4)
5. Training Certification of Georgia Assoc. of Professional Bondsmen, dated 08/26/2010, consisting of 1 page. (Exhibit 5)
6. Documentation supporting Claimant's employment with ASAP Towing, consisting of 5 pages. (Exhibit 6)
7. Claimant's Facebook Profile, dated 09/19/2011, consisting of 2 pages. (Exhibit 7)

STATEMENT OF THE CASE

This matter arises to determine the issues raised in the parties' Forms 50 and 51. Claimant alleges that she sustained an injury to the back which resulted in a fusion surgery and a recommendation for additional surgery which she currently declines. A previous order states the Claimant suffered injury to her back and hip that affects her right leg. She alleges that she is entitled to permanent and total disability utilizing two body parts under §42-9-10 or based on greater than fifty percent disability to the back under §42-9-30. She sought lifetime medical treatment and an award paid in lump sum with James v. Anne's language. She admits that she worked for a period of time, but denies that she can continue working. Claimant points to a vocational evaluation and page 77 of the APA's as evidence that she can no longer work.

The Defendants allege that Claimant can work and may continue to be working as evidenced by video surveillance, testimony, and other evidence. Defendants' admit that

Claimant has been rated at 36 percent to the back, but point out that is based on the AMA Guides 6th Edition and the fact she had surgery. They allege that Claimant can work regardless of any reports and argue that the actual impairment should not actually exceed the rating. Defendants request a credit for overpayment of benefits and object to lump sum payment if Claimant were to be found totally disabled. Defendants requested a finding on credibility due to numerous inconsistencies. Finally, Defendants allege Claimant is only entitled to compensation under §42-9-30 and that *Singleton* would apply because she has no ratable impairment other than the back.

Claimant objected to the inclusion of a letter from the Attorney General's office in Defendants' Exhibit 1. This objection was granted and page one was removed from the record.

Claimant objected to the inclusion of a letter from Garry Smith in Defendants' Exhibit 1 into evidence based on allegations that it constituted improper ex parte communication, hearsay, and threat of criminal prosecution. The Claimant additionally argued that the entire Workers' Compensation Commission should recuse themselves from hearing this claim. The Defendants countered that it is not a threat, but simply evidence that a fraud investigation is ongoing. Furthermore, neither the Defendants' Attorney, the Employer, or Carrier was engaged in the communication; it was between the Attorney General's Office, the Workers' Compensation Commission, and the complainant. The Claimant's objections were denied.

Claimant objected to the inclusion of Defendants' Exhibit 2 which is a surveillance report. The objection was granted and Exhibit 2 was removed from the record.

Claimant objected to Defendants' Exhibit 3 which is surveillance footage of the Claimant as being unduly prejudicial. The objection was denied and the surveillance footage was made a part of the record.

EVIDENCE OF THE CASE

Testimony of the Claimant

Claimant is a 46 year old married woman with two minor children. (Tr. at 16-17). She has an associates degrec in business management and has experience working in restaurants, construction, meat cutting, and as a bail bondsman. (Tr. at 17). Claimant worked as a meat cutter at the time of her injury and does not believe she can return to this employment field. (Tr. at 18).

Claimant testified she treated with Dr. Wolgin, who performed fusion surgery at L4-5 and L5-S1. She stated that surgery resolved her sciatic pain but that bending coming off the floor remains difficult. (Tr. at 19). She testified that her surgery resulted in a non-union and prospects of a second surgery's success were only 50/50. She declined the additional surgery and stated that she was placed on "extreme light duty." (Tr. at 20-21). Claimant stated that her pain is about 6/10 and can worsen with activity. (Tr. at 39).

Claimant testified that she worked for Steve McGowan at ABC Bail Bonding during the summer of 2010 and worked 20 or more hours per week. (Tr. at 21-22). Claimant testified regarding a calendar that purported to list hours and dates she worked for ABC. Defendants objected to the inclusion of the calendar based on the fact it had not been produced until the Hearing and contained no evidence of pay and did not reference Claimant's name anywhere in the document. The objection was denied. (Tr. at 24). The calendar contains numerous notations, appointments, and work schedules.

Claimant testified that as of November 30, 2010, Claimant's pain was aggravated by the several months of work and noted that she requested additional medications from Dr. Wolgin, which were denied. (Tr. at 26). Claimant stopped working for ABC on January 21, 2011. (Tr. at 28). Claimant was placed at MMI on February 14, 2011.

Claimant testified that she was approached by a competitor, A1 Bail Bonding, about changing her license to its business, place advertising on her truck, and using her name for marketing purposes. (Tr. at 29-30). She alleged that she completed one bond in February 2011 to change the license but did no other work and received no payment. (Tr. at 29-30). According to her testimony, the Claimant entered bonds and advertised for A1 Bail Bonding without compensation. Claimant testified she began doing more bonds in July, August, and September 2011 and was reported by her former employer. (Tr. at 31, 34, 35). Claimant indicated that she arranged for Mary Weaver to work at A1 so that she would not have to get up at all hours of the night. (Tr. at 34-35). Claimant testified regarding an entry on her Facebook page indicating she was "Self Employed and Loving It!" as a bondsman and "bond you out of jail if you need me call me." (Exhibit 7). Claimant testified she took a stalking order out against her former employer because she was aware he was investigating the work she was doing for her competitor. (Tr. at 39-41). On cross-examination, she admitted that the order prohibited her from contacting Mr. McGowan as well. (Tr. at 61).

Claimant testified on cross-examination that she performed the same work for A1 Bail Bonding *for free* as the work she did for pay at ABC Bail Bonding. (Tr. at 49). Claimant was asked why she didn't admit she was working for A1 Bail Bonding when her deposition was taken in August 2011. (Tr. at 49-50; Deposition at 7). She testified that, although she had performed numerous bonds between February and September 2011, she did not consider it work. (Tr. at 50). Claimant admitted that her response at her deposition to whether she was working was "no" and at the Hearing her answer was "yes." (Tr. at 53). Claimant denied that she had time cards when she worked for Steve McGowan at ABC. (Tr. at 53).

Claimant testified that she also worked for ASAP Towing, Steve McGowan's other business. (Tr. at 54). Claimant worked there with her husband and denied that she would affix her husband's name to work she performed. (Tr. at 54).

She also testified at her deposition that she had no further education or certification since the date of injury. However, she admitted at the Hearing that she received certification as a bail bondsman in August 2010. (Tr. at 50). Claimant also admitted that she received a diploma in accounting in 2010 that she did not previously report. (Tr. at 51). Claimant admitted that her response at her deposition to whether she received additional certification or education was "no" and at the Hearing her answer was "yes." (Tr. at 53).

Surveillance footage of Claimant was referenced and Claimant admitted that she could work as long as there was not repetitive bending and twisting involved. (Tr. at 55). Claimant would not confirm or deny that she could repetitively bend based on footage of her bending to pick up items from the bottom shelf at Walmart. (Tr. at 56). She admitted she could pick up light things. (Tr. at 56-57). The Claimant testified she worked twenty hours a week for ABC during September 2010. (Tr. at 57). The September 30, 2010, medical report of Dr. Wolgin states "she is able to continue with her work which is three hours per day three days a week." (APA at 61). Moreover, the vocational report of Glenn Adams states the Claimant reported working an average of twelve hours a week, which is also less than her testimony would suggest. (Tr. at 59, APA at 98).

Claimant requested to call Tony Lee Owens. Defendants' objection to this testimony was granted and the testimony was taken as Proffered Testimony outside of the presence of the Commission and is not part of the record. (Tr. at 67).

Testimony of Steve McGowan

Steve McGowan was called by the Defendants. Mr. McGowan is the owner of ABC Bail Bonds and employed Claimant for about six months. (Tr. at 70). He hired Claimant as a result of the recommendation of her husband, an employee in his towing company. (Tr. at 72). She initially just worked on computers, but wanted to work more and more hours. (Tr. at 74). She went to Atlanta to receive her certification as a bail bondsman soon after in late-August 2010. (Tr. at 74). He stated that Claimant left his employment because she wanted more money. (Tr. at 78). He also indicated that he paid her under the table and under her husband's name because she requested it that way. (Tr. at 78). She began working about 10 hours a week but eventually began working 30-35 hours per week, and sometimes over 40 if she worked on a weekend. (Tr. at 79). Of note, documented work of as much as 29 hours per week was reflected in Claimant's personal calendar, but was not reflected in her deposition testimony or medical records. Mr. McGowan indicated he has observed Claimant working for A-1 Bail Bonds and has surveillance footage of her performing duties at the jailhouse bonding an individual from jail. (Tr. at 80-81).

On cross-examination, Mr. McGowan agreed that he knew Claimant had back pain and stiffness "every now and then." (Tr. at 83).

Medical Evidence

Claimant first presented to Loris Healthcare on February 24, 2008 complaining of right leg and hip pain from bumping her right hip against a table saw three days earlier. (APA 1 at 1, 4).

Claimant next presented to Strand Regional Specialty Associates on May 8, 2005. She was diagnosed with traumatic right trochanteric bursitis with possible mild sciatica. (APA 3 at

83). Claimant received an injection and was recommended to engage in physical therapy. (APA 3 at 84).

Claimant next treated with Dr. Wolgin and Orthopaedic Associates in Albany, Georgia. She first presented on September 16, 2008, complaining of persistent right hip pain with radiation all the way down the leg. (APA 2 at 6). MRI testing revealed mild degenerative and facet changes in the lower lumbar spine with an L4-5 small right neural foraminal disc protrusion. (APA 2 at 8). MRI testing of the right hip was normal. (APA 2 at 10). Based on the mild findings, Claimant was referred to physical therapy. (APA 2 at 11). After several weeks of physical therapy ending in October 2008, Claimant reported little relief. (APA 2 at 20, 21). She received brief pain management treatment in November and December 2008 with Dr. Lamar Moree. (APA 4 at 88-91).

At Claimant's next appointment on April 17, 2009, Dr. Wolgin opined that Claimant's injury was due to her back and not her hip. (APA 2 at 21). Based on her continued complaints and low benefit through therapy and injections, Dr. Wolgin recommended consideration of a one or two level fusion surgery. (APA 2 at 22). Dr. O'Leary provided a second opinion on July 7, 2009 and recommended injection therapy rather than surgery, but deferred to Dr. Wolgin. (APA 5 at 92-93). Claimant returned on February 2, 2010 complaining of the same low back and right leg pain. Due to the gap between treatment, Dr. Wolgin ordered additional MRI imaging to assess any changes. (APA 2 at 23).

Claimant's MRI's came back showing a possible tiny protrusion at L4-5 with mild facet arthropathy and no nerve root compression; L5-S1 showed mild changes as well. (APA 2 at 25). Claimant returned to Dr. Wolgin to discuss the tests and decided to move forward with surgery. (APA 2 at 26). A peer review was conducted on these findings and Dr. Wolgin and suggested a

psychosocial evaluation and a provocative discography. (APA 2 at 29; APA 6 at 94-95). Additional testing was not performed prior to surgery. (APA 2 generally).

Claimant underwent an L4-5, L5-S1 transforaminal lumbar interbody fusion on May 19, 2010. (APA 2 at 38-40). As of May 25, 2010, Claimant continued to complain of pain at an 8/10 level, but noted some improvement of leg complaints by May 27, 2010. (APA 2 at 42, 44). Claimant returned complaining of increased pain on June 22, 2010 and was given an injection. (APA 2 at 47). Dr. Wolgin anticipated that she would be written completely out of work for at least another month. (APA 2 at 47).

Claimant's leg pain improved as of July 20, 2010 but she complained that she still could not lay down in a bed and could not swim because of increased pain kicking her legs; she remained written completely out of work. (APA 2 at 53). Claimant was allowed to return to limited sedentary work as of August 27, 2010 and was recommended to begin physical therapy. (APA 2 at 57).

As of October 19, 2010, Claimant had been through a month of physical therapy with little benefit and reported an increase in her hip and back pain due to sleeping in a bed. (APA 2 at 64). Repeat injections completely relieved the hip pain and partially relieved the back. (APA 2 at 64). Seven days later a prescription note from Dr. Wolgin was prepared, writing her back out of work. (APA 2 at 66). On November 23, 2010, Claimant noted slow improvement, increased walking ability, and little to no leg pain or numbness. (APA 2 at 67). According to Dr. Wolgin's notes, sometime prior to December 21, 2010, Claimant began taking care of a 3-year old and began engaging in frequent bending, lifting, and twisting. (APA 2 at 70).

A CT scan on February 9, 2011 showed no evidence of hardware failure but did show evidence of non-union in places. (APA 2 at 72-76). As of February 14, 2011, Claimant stated

that she felt about the same in the right buttocks area, but did report relief of her prior leg complaints; she did not wish to undergo additional surgery. (APA 2 at 76). Claimant was released from care with a 36 percent impairment rating using the AMA Guides, 5th Edition. (APA 2 at 76, 78). Claimant reported that she continued to care for a toddler full time. (APA 2 at 76).

Claimant's Attorney referred her to Glen Adams for a vocational assessment on September 12, 2011. She reported that she worked for ABC Bail Bonding during January 2011 but only worked 12 hours a week. (APA 7 at 96-106). She reported that Dr. Wolgin supported a trial return to work in January, however, there are no records reflecting this and he continued to place her completely out of work at that time. Claimant was found to be totally disabled; however, she did not disclose any additional employment other than minor, part-time work during January 2011.

FINDINGS OF FACT

Based upon the testimony and exhibits submitted, the undersigned Commissioner makes the following findings of fact:

1. Claimant injured back in an admitted work-related accident on February 24, 2008. The injury affects the left hip/leg (See Order of October 13, 2009.)
2. Defendant to pay all causally related authorized medicals.
3. Claimant had a two level fusion which was not successful. There is a non-union and Claimant is a candidate for another surgery; at present she chooses not to have the surgery.

4. Claimant testified that she attempted to work within her restrictions. Claimant stated she worked about 20 hours per week for \$8.00 per hour. Claimant worked until January 2011 and stated she was unable to work anymore.
5. Claimant was placed at MMI on February 14, 2011, given a 36% impairment rating with restrictions of "unable to return to work" (APA 2 at 76).
6. Claimant stated she helped Tony at A1 Bail Bonding for about a month with bonding and according to Exhibit #1 worked a limited amount of time. She got another person to help because she physically was unable to meet the demands of the job.
7. Claimant stated she had earned money in spite of denying this in her deposition. She further stated that in order to keep her mind occupied she participated in social media.
8. Claimant admitted she was helping Tony but denied that she received any pay. This was for the same job she did prior for which she did receive pay. Claimant stated that she said she was not working in her deposition in May 2011, because she did not consider what she was doing work.
9. A surveillance photograph from September 2011 shows Claimant's vehicle with an advertisement on the back window promoting A-1 Bail Bonds with a 24 hour contact number. (Exhibit 4).
10. As of September 19, 2011, Claimant's Facebook profile showed that her employer was "Self Employed and Loving It!" as a Professional Bondsman in Leesburg, Georgia. It states, "bond you out of jail if you need me call me." (Exhibit 7).
11. Claimant stated she had received no certifications in her depositions but she did in fact have training as a bondsman. (Exhibit 5).

12. Claimant stated she could work as long as she did not have to bend over or do lifting. There was conflicting testimony as to what Claimant said she was working and what reports indicated she could work. The surveillance footage also showed Claimant squatting, bending, and lifting in a manner well-exceeding her self-reported limitations.
13. Claimant indicated to Dr. Wolgin that she took over as the primary caregiver for a toddler and engaged in regular bending, lifting, and twisting. He indicated he was concerned these activities could be exacerbating her symptoms.
14. Claimant stated she recruited a person to work for Tony who was paid. Claimant stated she did the same job but got no pay. She stated she did this because she felt sorry for Tony.
15. A witness for the Defendant, Mr. McGowan stated Claimant is currently working for another company and he took a video of Claimant in the jail house with a file in her hand bailing out someone.
16. Mr. McGowan estimated that Claimant worked for him from August 2010, to January 2011. He knew Claimant's husband and hired Claimant. Witness stated Claimant was good with computers and eventually got a certification for her license to write bail bonds. (Exhibit 5).
17. Witness stated Claimant left because she needed more hours and he paid her \$8.00 per hour up to 30 to 40 hours per week. She averaged about 30 hours.
18. Based on this testimony and the Claimant's, I find Claimant did work for AI Bail Bonding and provided an inaccurate account to her vocational assessor regarding the length of time she was employed with ABC, the amount she was paid per hour, and the amount of hours she was able to work.

19. The Claimant failed to disclose her second job with A1 Bail Bonding to her vocational assessor and at her deposition. Clearly a vocational assessor uses self-reported earning capacity, low hours, and meager recent work history as evidence to conclude that no viable employment was available.
20. Compensation Rate: \$299.59.
21. After considering all of the evidence I find Claimant has suffered a 40% PPD to the back. I did not find her a credible witness and believe she can work.
22. Defendant to receive credit for all wages paid during the disability period and a credit for temporary total disability benefits paid following maximum medical improvement on February 14, 2011.
23. Claimant to have lifetime replacement of any hardware.

CONCLUSIONS OF LAW

It is concluded under the South Carolina Worker's Compensation Act in Section 42-1-10 S.C. Code of Laws, et. seq., that:

1. Pursuant to § 42-1-40, Claimant had an average weekly wage of \$449.36 and a corresponding compensation rate of \$299.59.
2. Pursuant to § 42-1-130, Claimant was an employee at the time of the alleged work injury.
3. Pursuant to § 42-1-160, Claimant sustained an admitted injury by accident to the back, arising out of and in the course and scope of her employment with the Defendants on February 21, 2008.
4. Pursuant to § 42-9-30, Claimant is entitled to forty percent disability for her injury to the back.

5. Pursuant to § 42-15-60, Claimant achieved maximum medical improvement to the back on February 14, 2010 per the authorized treating physician, Dr. Mark A. Wolgin.
6. Pursuant to § 42-9-210 and *Curriel v. Env. Management Services*, 655 S.E.2d 482 (2007), the date of maximum medical improvement signals the end of entitlement to temporary total benefits), the Defendants are entitled to a credit for overpayment of temporary total benefits from the date of maximum medical improvement, February 14, 2011 and credit for any wages earned while paying benefits during the prior disability period.

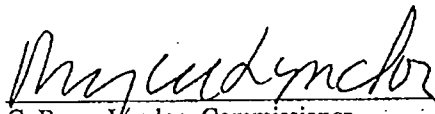
ORDER

IT IS HEREBY ORDERED that the greater weight of evidence supports a finding that Claimant suffered an admitted injury by accident to the back. Claimant's injury resulted in a forty percent (40%) disability to the back.

IT IS HEREBY ORDERED that the greater weight of evidence supports a finding that the Defendants are entitled to credit for overpayment of temporary total benefits from the date of maximum medical improvement, February 14, 2011 at a rate of \$299.59 and credit for any wages earned while paying benefits during the prior disability period.

IT IS HEREBY ORDERED that Defendants shall furnish any prosthetic devices during the life of the Claimant or for so long as such devices are necessary.

AND IT IS SO ORDERED.



G. Bryan Byndon, Commissioner
South Carolina Workers' Compensation Commission
CERTIFICATE OF SERVICE

This is to certify the undersigned has this date served this order in the above entitled action upon all parties to this cause by sending an electronic copy hereof by electronic mail addressed to the attorney or attorneys for said parties or by depositing a copy hereof, postage paid, in the United States certified mail addressed to any unrepresented party.
January 18, 2012

By: Tamara Morris, Administrative Assistant to Commissioner Lyndon

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

W.C.C. File No. 0810152

Patricia Fore, Employee,Appellant,

v.

Griffco of Wampee, Inc., Employer, and
Chartis Claims, Inc., Carrier. Respondents.

PROOF OF SERVICE

I certify that on the 18th day of July 2013, I served the **Respondents' Motion to Correct Record on Appeal** on Patricia Fore by depositing a copy of it in the United States Mail, postage prepaid, addressed to her attorneys of record:

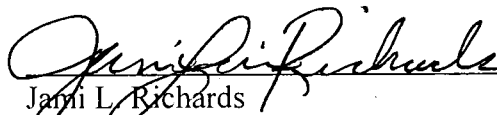
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JUL 22 2013

SC Court of Appeals



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