

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SEP 05 2013

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Circuit Court

Alison Renee Lee, Circuit Court Judge

69654

Case No. 2011CP4003561

Gertrude Shiver

Claimant, Appellant,

v.

Palmetto Health Richland, Employer,
Key Risk Management Services, Inc., TPA
Palmetto Hospital Trust Services, Carrier,
Trident Regional Medical Center, Employer,
Zurich American Insurance Company, Carrier

Respondents,

MOTION TO INCLUDE THE ADDENDUM TO THE INITIAL BRIEF

I am making a motion to include the addendum to the initial brief. The Initial brief was sent to the opposing attorneys prematurely on April 26, 2013, before the transcript was received. It was sent through certified mail. It was more expedient and cost saving for me to send an addendum instead of resubmitting the initial brief with the information typed into the initial brief to the court and to the opposing parties after reading the transcript.

Therefore, I am asking the court to accept the addendum as part of the initial brief. There is no memorandum with citation of authorities in support of the motion to be submitted. I thought that this was more cost saving to me and less confusing for the opposing parties to add an addendum instead of resending the initial brief to the opposing parties. All information in the addendum is relevant to the case at hand. In addition, I was deprived of my PTO days as a result of being fired from Palmetto Health Richland Hospital.

Thanks so much for the Appellate Court considering this matter.

Sincerely,

A handwritten signature in cursive script that reads "Gertrude Shiver".

Gertrude Shiver
1026 Congaree Church Rd.
Gadsden, S. C. 29052
(803) 353-3892
g.shiver@att.net

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Zurich American Insurance Company, Carrier

Respondents,

CERTIFICATE OF SERVICE

I certify that I will serve a Notice of the Motion to include the Addendum to the original Initial Brief to Attorneys, Sims, Carter, and Chase on September 5, 2013.

September 4, 2013

Gertrude Shiver, Pro se'
1026 Congaree Church Rd.
Gadsden, S. C. 29052
(803) 353-3892

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SC Court of Appeals

September 4, 2013

Michael E. Chase., Esq.
Turner Padget Graham & Laney, P. A.
P. O. Box 1473
Columbia, S. C. 29202

Dear Attorney Chase:

This is a notification that I will file a Motion on September 5, 2013, with the Appellate Court to include the addendum to the original initial brief that was sent prematurely on April 26, 2013.

The Addendum to the Initial Brief was sent to you on August 21, 2013.

Sincerely,



Gertrude Shiver
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