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Apr 28 2026

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
CIRCUIT COURT

Mikell Scarborough, Circuit Court Judge

Case No. 2015-CP-10-06684
Appellate Case No. 2025-001339

Palmetto Contract Services, Inc.Appellant,

v.

Zurich American Insurance Company of IllinoisRespondent.

AMENDED DESIGNATION OF MATTER TO BE INCLUDED ON APPEAL

Appellant proposes the following to be included in the consolidated Record on Appeal.

1. Respondent’s Summons and Complaint filed December 11, 2015.
2. Amended Answer and Counterclaim of Appellant filed September 29, 2017.
3. Reply to the Amended Answer and Counterclaim filed October 26, 2017.
4. Respondent’s Motion and Memorandum for Summary Judgment dated February 12, 2025.
5. Appellant’s Memorandum in Opposition to Respondent’s Motion for Summary Judgment filed February 24, 2025.
6. Order granting Respondent’s Motion for Summary Judgment dated June 20, 2025.
7. Appellant’s Motion to Alter or Amend Grant of MSJ dated June 25, 2025.
8. Order denying Appellant’s Motion to Alter or Amend filed June 26, 2025.

9. Summary Judgment Hearing Transcript of February 24, 2025.
10. Workers' Compensation Insurance Contract dated January 12, 2012.
11. Deposition transcript of Armando Lantigua with Defendant's Exhibits 1-12 and Plaintiff's Exhibit 1.
 - a. Defendant's Exhibit 1: Description of Operations
 - b. Defendant's Exhibit 3: Scope Manual definitions for relevant work categories
 - c. Defendant's Exhibit 4: 2009 amendment excluding repair of recreational vessels from USL&H
 - d. Defendant's Exhibit 5: emails with Evelyn Wyatt and Bill Deytens
 - e. Defendant's Exhibit 6: emails with Evelyn Wyatt and Bill Deytens
 - f. Defendant's Exhibit 7: 20 CFR §701.502
 - g. Defendant's Exhibit 8: 33 U.S.C.A. 902
 - h. Defendant's Exhibit 9: Letter from Palmetto Contract Services, Inc. to carrier about premium dispute
 - i. Defendant's Exhibit 10: Deytens Boatyard, Inc. payroll figures
 - j. Defendant's Exhibit 11: Palmetto Contract Services, Inc.'s payroll figures
 - k. Defendant's Exhibit 12: emails related to audit dispute
 - l. Plaintiff's Exhibit 1: emails related to audit dispute
12. Invoice for \$158,744.00 from Zurich to Palmetto.

Pursuant to Rule 209(c), SCACR, I certify that this Amended Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

2309 Devine Street

Columbia, South Carolina 29205

(803) 251-4517

(803) 251-4527 Facsimile

jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina

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PROOF OF SERVICE

I certify that I have served a copy of **Appellant's Amended Designation of Matter** on the following via email address on April 28, 2026.

Larry D. Cohen, Esquire Larry D. Cohen, LLC ldcohen@ldcohenlaw.com	Carolyn H. Blue, Esquire carolyn.blue@ymail.com
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GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

Attorney for Appellant

T. Jeff Goodwyn, Jr.*†
Jefferson D. Turnipseed**

GOODWYN LAW FIRM, LLC

Tel. (803) 251-4517
Fax (803) 251-4527

2309 Devine Street
Columbia, South Carolina 29205

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

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SC Court of Appeals

VIA E-FILING

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

Re: ***Palmetto Contract Services, Inc. v Zurich American Insurance Company of Illionis***
Case No.: 2015-CP-10-06684
Appellate Case No.: 2025-001339
Our File No.: 3000-00691

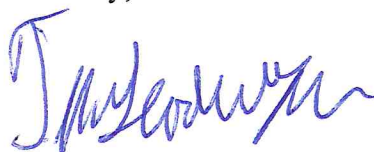
Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the **Appellant's Amended Designation of Matter and Proof of Service** for filing in connection with the above-referenced matter. The check has been placed in today's mail.

I have copied all interested parties with a copy of this letter as evidenced below.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

cc: Carolyn H. Blue, Esquire
Larry D. Cohen, Esquire
(all via email)