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May 19 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Walter R. Hoover, Jr.,
Appellant,

v.

Tractor Supply Company, Employer, and Starr Specialty Insurance Company, Carrier,
Respondents.

Appellate Case No. 2025-001248

**APPELLANT'S REPLY TO RESPONDENTS' RETURN TO APPELLANT'S MOTION
REGARDING COMPLETENESS OF THE RECORD ON APPEAL**

Appellant, proceeding pro se, respectfully submits this Reply to Respondents' Return to Appellant's Motion Regarding Completeness of the Record on Appeal.

Respondents previously asserted that omissions from the Record were intentional. Appellant disputes that characterization. Appellant presented the Record and Appendix from the materials received from the South Carolina Workers' Compensation Commission and expressly preserved his objection that the materials appeared incomplete, improperly compiled, and not reliable as a complete Record. Because Respondents characterized the omissions as intentional, Appellant believed the most appropriate way to avoid further dispute was to seek this Court's direction before correcting, supplementing, or clarifying the Record.

Although Respondents have now attached materials they identify as their full APA submissions, Respondents' Designation of Matters identified only 'Respondents' Pre-Hearing Brief and APA Submissions,' without a date or version. Appellant's concern was reasonable because the Commission materials produced to him contained multiple APA-related filings, transmittals, incomplete materials, and inconsistent versions. Appellant therefore sought Court direction before correcting or supplementing the Record.

Appellant further notes that he included the Full Commission Hearing Transcript with his April 7, 2026 Motion Regarding Completeness of the Record on Appeal. Appellant therefore disputes any continuing suggestion that the transcript was being withheld, concealed, or intentionally omitted.

Appellant does not oppose correction of the Record as directed by this Court. Because Respondents previously characterized the omissions as intentional, Appellant believed the most appropriate course was to seek Court direction and correct or supplement the Record in the manner ordered by the Court.

Respondents' Return asks that Appellant's Motion be denied and that Appellant be required to correct the Record according to Respondents' Designation of Matters. Appellant respectfully submits that Court direction remains appropriate for the reasons stated above.

For these reasons, Appellant respectfully requests that the Court reject Respondents' characterization of Appellant's conduct as intentional noncompliance and issue appropriate

direction regarding correction, supplementation, clarification, or other relief the Court deems proper.

Respectfully submitted,

Walter R Hoover Jr

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CERTIFICATE OF SERVICE

I hereby certify that on this 19 day of May, 2026, I served a copy of the foregoing upon counsel for Respondents by electronic mail and/or other approved method of service addressed as follows:

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