

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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W.C.C. File No. 1213162

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William E. Miller, Jr., Employee, Claimant .....Appellant,  
v.

Owen Steel Company, Inc., Employer, and  
Great American Insurance Group  
c/o Strategic Comp Services, Carrier, ..... Respondents.

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**MOTION TO CORRECT  
RECORD ON APPEAL**

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Pursuant to Rule 210, SCACR, Respondents Owen Steel Company, Inc. and Great American Insurance Group c/o Strategic Comp Services move this Court to order Appellant William E. Miller, Jr. to make the following correction to the Record on Appeal:

- Appellant failed to include pages 73, and pages 125 through 130 of the APA's filed with the Commission, which were designated by Respondents. (Att A)

Respondents further request this Court to order that the Final Briefs in this appeal will not be due until the Record on Appeal has been properly corrected.

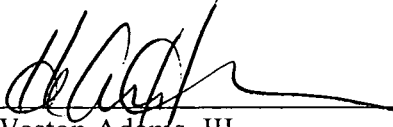
This motion conforms with Rule 240, SCACR.

[SIGNATURE ON FOLLOWING PAGE]

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**SC Court of Appeals**

McANGUS GOUDELCK & COURIE, L.L.C.

April 16, 2014



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*Attorneys for Respondents Owen Steel Company,  
Inc. and Great American Insurance Group c/o  
Strategic Comp Services*

# Attachment A

THE STATE OF SOUTH CAROLINA  
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**DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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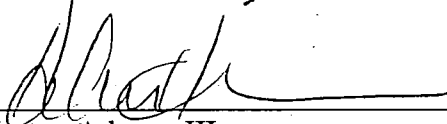
Respondents propose the following be included in the Record on Appeal:

1. Amended Decision and Order of Single Commissioner Derrick L. Williams, dated January 27, 2013;
2. Decision and Order of the Appellate Panel of the Full Commission, dated July 2, 2013;
3. Claimant's Form 50, dated September 27, 2012;
4. Respondents' Form 51, dated October 12, 2012;
5. Claimant's Form 30, dated February 6, 2012;
6. Transcript of Hearing before the Single Commissioner on December 10, 2012, pp. 6-11, 14-16, 18-29, 33, 35-53, 59, 60, 66, 68, 70-75, 79, 85-87, 89-108, 113-116, 119-127, 131-135, 137-139, 143-149, 152, 154; and,
7. APA pp. 2, 6, 7, 30, 32-43, 46, 59, 60, 68, 69, 73, 82-93, 106-133, 135, 138, 139.

I certify that this designation contains no matter that is irrelevant to this appeal.

McANGUS GOUDELOCK & COURIE, L.L.C.

January 7, 2014



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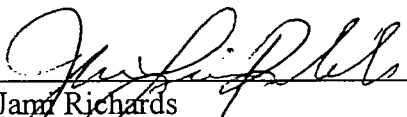
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**PROOF OF SERVICE**

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I certify that I have served the **Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal** on William E. Miller, Jr., by depositing a copy of it in the United States Mail, postage prepaid, on January 7, 2014, addressed to his attorney of record:

J. Charles Ormond, Jr., Esq.  
Holler Garner Corbett Ormond Plante & Dunn  
P.O. Box 11006  
Columbia, SC 29211

  
\_\_\_\_\_  
Jamie Richards  
Legal Assistant to Helen F. Hiser  
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*Attorneys for Respondents*

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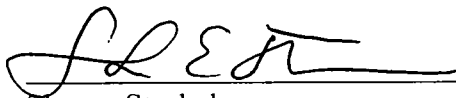
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**PROOF OF SERVICE**

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I certify that I have served the **Respondents' Motion to Correct Record on Appeal** on William E. Miller, Jr., by depositing a copy of it in the United States Mail, postage prepaid, on April 16, 2014, addressed to his attorney of record:

J. Charles Ormond, Jr., Esq.  
Holler Garner Corbett Ormond Plante & Dunn  
P.O. Box 11006  
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Sharon Strubel  
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*Attorneys for Respondents*

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**SC Court of Appeals**



**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

April 16, 2014

**Via U.S. Mail**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: William Miller v. Owen Steel Company, Inc.  
and Great American Insurance Group c/o Strategic Comp Services  
Date of Accident: August 15, 2012  
WCC File No.: 1213162  
Our File No.: 20496.12004  
Claim No.: 564579791  
Appeal Tracking No.: 2013-001564

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondents' Motion to Correct Record on Appeal, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return the clocked-in copies in the self-addressed, stamped envelope. Also, enclosed is our firm's check in the amount of \$25 for filing the motion.

If you have any questions, please do not hesitate to contact me.

Yours truly,  
McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

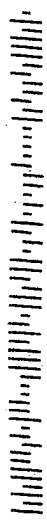
cc: J. Charles Ormond, Jr., Esquire

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**mqc** | **INSURANCE  
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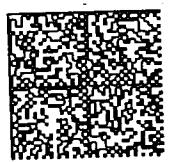
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**20496.12004/HFH**  
The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
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APR 21 2014

**SC Court of Appeals**



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