

# TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

CHARLESTON  
COLUMBIA  
FLORENCE  
GREENVILLE  
MYRTLE BEACH

**Carmelo B. Sammataro**

E-mail: [CSammataro@TurnerPadget.com](mailto:CSammataro@TurnerPadget.com)

Writer's Direct Dial: (803) 227-4253

Writer's Direct Fax: (803) 400-1532

October 22, 2014

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

**RECEIVED**

OCT 22 2014

**SC Court of Appeals**

Re: Gertrude Shiver v. Palmetto Health Richland, Key Risk Management Services, Inc., Palmetto Hospital Trust Services, Trident Regional Medical Center and Zurich American Insurance Company  
Appellate Tracking No.: 2013-000887  
File No.: 1329.238

Dear Ms. Kitchings:

Enclosed please find the following:

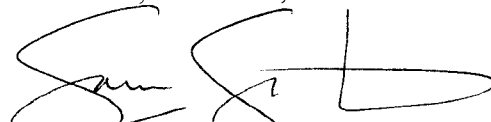
1. Two copies of my correspondence of even date to Appellant forwarding copies of additional designated documents; and
2. Original and one copy of the Proof of Service regarding documents produced to Appellant.

Please file the original documents and return a clocked copy of each to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Carmelo B. Sammataro

BUSINESS • LITIGATION • SOLUTIONS

Bank of America Plaza • 17th Floor • 1901 Main Street (29201) • PO Box 1473 • Columbia, SC 29202  
Phone (803) 254-2200 • Fax (803) 799-3957 • [turnerpadget.com](http://turnerpadget.com)

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CBS/tj

Enclosures

cc: Ms. Gertrude Shiver  
Lana H. Sims, Jr., Esquire  
Andrew W. Fajardo, Esquire  
Allison M. Carter, Esquire  
(w/enc.)

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**SC Court of Appeals**

Ms. Gertrude Shiver  
Appellant, *Pro Se*  
1026 Congaree Church Road  
Gadsden, SC 29052

Re: Gertrude Shiver v. Palmetto Health Richland, Key Risk Management Services, Inc., Palmetto Hospital Trust Services, Trident Regional Medical Center and Zurich American Insurance Company  
Appellate Tracking No.: 2013-000887  
File No.: 1329.238

Dear Ms. Shiver:

We are in receipt of your correspondence dated October 15, 2014 (postmarked October 16th), requesting copies of additional documents to be included in the Record on Appeal. Following is a list of those documents that we believe to be responsive to your request. For clarification purposes, this list reflects both the item number listed in your correspondence, as well as the correct item number for each document as identified in Respondents' Amended Designation of Matter:

<u>Item No. Listed in Appellant's 10/15/14 Correspondence</u>	<u>Correct Item No. per Respondents' Amended Designation of Matter</u>	<u>Document Identified</u>	<u>Copies Enclosed</u>
14	13	August 8, 2007 Form 51, Employer's Answer (WCC Claim No. 0217755);	Yes (1 page)
17	16	July 23, 2007 Form 50, Request for Hearing (WCC Claim No. 9503744);	Yes (4 pages)
18	17	November 13, 2006 Form 51, Employer's Answer (WCC Claim	Yes (1 page)

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# TURNER PADGET

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		No. 0616756);	
25	24	October 18, 2005 Form 50, Request for Hearing (WCC Claim No. 0321756); and	Yes (4 pages)
29	29	Respondents Trident Regional Medical Center and Zurich American Insurance Company's APA pp. 9-38, 106 (WCC Claim No. 9503744).	No (*Please see explanation below.)

\*This is the same document that was identified as Item No. 32 on Respondents' original Designation of Matter. Pursuant to the Court's Order dated October 1, 2014, a copy of this thirty-two page document was previously provided to you under cover of letter dated October 7, 2014, behind Tab No. 32.

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

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Carmelo B. Sammataro

CBS/tj

Enclosures

cc: The Honorable Jenny Abbott Kitchings, Clerk  
Lana H. Sims, Jr., Esquire  
Andrew W. Fajardo, Esquire  
Allison M. Carter, Esquire  
(w/o enc.)

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court Of Common Pleas

Alison Renee Lee, Circuit Court Judge

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Appellate Case No. 2013-000887

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**RECEIVED**  
OCT 22 2014  
**SC Court of Appeals**

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, and Zurich American Insurance Company, Carrier, ..... Respondents.

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PROOF OF SERVICE

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I certify this 22nd day of October 2014 that I have served copies of the documents identified in Respondents' Amended Designation Of Matter To Be Included In The Record On Appeal as Item Numbers 13, 16, 17, and 24, postage prepaid in the United States mail, addressed to the following:

Ms. Gertrude Shiver  
1026 Congaree Church Road  
Gadsden, SC 29052  
*(cover letter and documents)*  
**APPELLANT, PRO SE**

Allison M. Carter, Esquire  
Wilson Jones Carter & Baxley, P.A.  
421 Wando Park Blvd., Ste. 100  
Mt. Pleasant, SC 29464  
*(cover letter only)*  
**ATTORNEYS FOR RESPONDENTS  
TRIDENT REGIONAL MEDICAL  
CENTER AND ZURICH AMERICAN  
INSURANCE COMPANY**

Lana H. Sims, Jr., Esquire  
Andrew W. Fajardo, Esquire  
Adams and Reese LLP  
P. O. Box 2285  
Columbia, SC 29202

*(cover letter only)*

**ATTORNEYS FOR RESPONDENTS  
PALMETTO HEALTH RICHLAND  
AND PALMETTO HOSPITAL TRUST  
SERVICES**

October 22, 2014

By:



---

Michael E. Chase (Bar No. 15230)  
Carmelo B. Sammataro (Bar No. 69746)  
TURNER PADGET GRAHAM & LANEY P.A.  
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**ATTORNEYS FOR RESPONDENTS  
PALMETTO HEALTH RICHLAND AND KEY  
RISK MANAGEMENT SERVICES, INC.**