

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. 1116275

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John McDaniel, Employee,.....Appellant,

v.

Career Employment Professional  
d/b/a Snelling Staffing, Employer, and  
United Wisconsin Insurance Co., Carrier,..... Respondents.

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**RESPONDENTS' 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. Order of Hearing Commissioner Melody L. James, filed Jan. 4, 2013;
2. Order of Hearing Commissioner Melody L. James, filed Sept. 30, 2013;
3. Appellate Panel Decision and Order of the South Carolina Workers' Compensation Commission, filed Dec. 19, 2013;
4. Order Relieving Counsel, dated March 29, 2013;
5. Judicial Conference Decision and Order, dated April 15, 2013;
6. Judicial Conference Decision and Order, dated May 20, 2013;
7. Administrative Order re Form 32(s), dated June 3, 2013;

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8. Judicial Conference Decision and Order concerning Motion for Additional Evidence Dated May 6, 2013, filed June 17, 2013;
9. Judicial Conference Decision and Order concerning Motion for Additional Evidence Dated May 10, 2013, filed June 17, 2013;
10. Judicial Conference Decision and Order, dated August 12, 2013;
11. Notice of Appellate Hearing, dated March 29, 2013;
12. Notice of Hearing, dated June 19, 2013;
13. Notice of Appellate Hearing, dated Oct. 1, 2013;
14. Request for Proposed Order, dated Dec. 3, 2012;
15. Request for Proposed Order, dated Aug. 6, 2013;
16. Request for a Proposed Decision and Order, emailed and mailed Oct. 31, 2013;
17. Transcript of Hearing before Hearing Commissioner James, held Nov. 28, 2012;
18. Transcript of Hearing before Hearing Commissioner James, held July 8, 2013;
19. Transcript of Hearing before the Full Commission Panel Hearing, held October 14, 2013;
20. Transcript of Deposition of Daniel J. Cobb, Aug. 20, 2012;
21. Claimant's Form 50, dated May 18, 2012;
22. Respondents' Form 51, dated June 15, 2012;
23. Respondents' Form 21, dated Sept. 17, 2012;
24. Claimant's Form 58, Pre-Hearing Brief, served October 31, 2012;
25. Claimant's APA pp. 1-15, 21-60, 91-109, 120-125;
26. Claimant's Form 30, dated Jan. 14, 2013;
27. Claimant's Motion Pursuant to Regulation 67-707 to Admit Additional and Newly Discovered Evidence, dated Mar. 8, 2013;
28. Brief on Behalf of Claimant/Appellant, dated March 26, 2013;

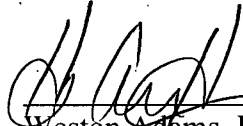
29. Respondents' Brief to the Full Commission, dated April 10, 2013;
30. Claimant's Motion for additional Evidence to Complete the Record and Notice of Additional Evidence and Additional APA Submissions on behalf of the Claimant, dated May 6, 2013;
31. Claimant's Motion for additional Evidence and Testimony to Complete the Record, dated May 10, 2013;
32. Appellant's Reply to Respondents' Brief, served by the Commission on May 15, 2013;
33. Defendants' Response to Claimant's 2<sup>nd</sup> Motion to Add Additional and Newly Discovered Evidence and Notice of Additional APA Submissions, dated May 16, 2013;
34. Claimant's Notice of Additional Evidence to be Introduced into the Record, APA pp. 210-278, dated May 17, 2013;
35. Claimant's Motion for Penalties and Sanctions for Failure to provide Medical Treatment and Failure to Provide Medical Treatment in a Timely Manner, dated June 11, 2013 and filed with the Commission on June 14, 2013;
36. Defendants' Response to Claimant's Motion for Penalties and Sanctions for Failure to Provide Medical Treatment and Failure to Provide Medical Treatment in a Timely Manner, dated June 21, 2013;
37. Subpoenas to Jim Pascutti, Angela Baldwin and Nicole Service, served on Respondents under cover of letter dated June 27, 2013;
38. Motion to Quash Claimant's June 27, 2013 Subpoenas to Angela Baldwin, Jim Pascutti, and Nicole Service, dated July 2, 2013;
39. Subpoenas to Jim Pascutti, Angela Baldwin and Nicole Service, served on Respondents under cover of letter dated Oct. 4, 2013;
40. Motion to Quash Claimant's October 14, 2013 Subpoenas to Angela Baldwin, Jim Pascutti, and Nicole Service, dated Oct. 10, 2013;
41. Claimant's Amended Form 30, dated Oct. 9, 2013;
42. Email correspondence between Eugenia Hollmon and John McDaniel, "Re: motion for new evidence," dated April 15, 2013;
43. Letter from Valerie D. Deller to Allison Nussbaum, dated May 29, 2013;

44. Email correspondence between John McDaniel and Tamara Morris, "Re: wcc file # 1116275", dated June 26, 2013 and June 27, 2013;
45. Email correspondence from John McDaniel to Keith Roberts and Allison Nussbaum, "Re: Proposed Findings of Fact RE:SWCC file #1116275," dated Aug. 30, 2013;
46. Email correspondence between Keith Roberts, Tamara Morris, John McDaniel and Allison Nussbaum, "Re: John McDaniel Charleston Order Instructions from Commissioner James for Keith to prepare Order," dated Sept. 10, 2013;
47. Email correspondence between Keith Roberts, Gary Cannon, John McDaniel and Allison Nussbaum, "Re: Proposed order language," dated Sept. 13, 2013;
48. Email correspondence between John McDaniel, Eugenia Hollmon, Gary Cannon, Valerie Deller, Virginia Crocker, and Allison Nussbaum, "Re: receipt of order 'scwcc # 1116275'", dated Oct. 4, 2013;
49. Email correspondence between Virginia Crocker, John McDaniel, and Allison Nussbaum, "Re: receipt of order 'scwcc # 1116275'", dated Oct. 4, 2013;
50. Email correspondence between Keith Roberts, John McDaniel, Allison Nussbaum, Virginia Crocker and Gary Cannon, "Re: remanded or bifurcated? SCWCC file # 1116275," dated Oct. 8, 2013;
51. Email correspondence between Keith Roberts, John McDaniel, Allison Nussbaum, Virginia Crocker and Gary Cannon, "Re: remanded or bifurcated? SCWCC file # 1116275," dated Oct. 8, 2013;
52. Email correspondence between Keith Roberts, John McDaniel, Allison Nussbaum, Virginia Crocker and Gary Cannon, "Re FW; FW: remanded or bifurcated? SCWCC file #1116275," dated Oct. 9, 2013;
53. Email correspondence between Keith Roberts, John McDaniel, Gary Cannon, Virginia Crocker, Allison Nussbaum, "Re: Application for notice wcc #1116275," dated Oct. 10, 2013;
54. Email correspondence between Keith Roberts, John McDaniel, Allison Nussbaum, Virginia Crocker, Gary Cannon, E. Boyd, and Elizabeth McDaniel, "Re: FW: FW: remanded or bifurcated? SCWCC file # 1116275," dated Oct. 12, 2013;
55. Appellant's Response to Respondents' Motion to Strike and/or Amend Claimants Initial Brief and Designation of Matter, dated May 31, 2014.

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

October 7, 2014

**McANGUS GOUDELOCK & COURIE LLC**



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*Attorneys for Respondents*

THE STATE OF SOUTH CAROLINA  
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APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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W.C.C. File No. 1116275

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John McDaniel, Employee,.....Appellant,

v.

Career Employment Professional  
d/b/a Snelling Staffing, Employer, and  
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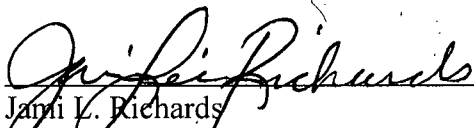
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**PROOF OF SERVICE**

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I certify that on the 17th day of October, 2014, I served the **Initial Brief of Respondents and Respondents' Designation of Matter to be Included in the Record on Appeal** on John McDaniel by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

John C. McDaniel, *Pro Se*  
1387 Camp Road, Unit C  
Charleston, SC 29412

  
\_\_\_\_\_  
Jami L. Richards  
Legal Assistant to Helen F. Hiser  
McAngus, Goudelock & Courie LLC  
735 Johnnie Dodds Blvd., Suite 200  
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*Attorneys for Respondents Career Employment  
Professional d/b/a Snelling Staffing and United  
Wisconsin Insurance Co.*

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**Reply To**

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

October 17, 2014

**Via U.S. Mail**

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

RE: John McDaniel v. Career Employment Professionals d/b/a Snelling Staffing  
Services and United Wisconsin Insurance Company c/o United Heartland  
Date of Accident: November 21, 2011  
WCC File No.: 1116275  
Our File No.: 20638.12027  
Claim No.: 041100021048  
Appellate Tracking No.: 2014-000186

Dear Ms. Kitchings:

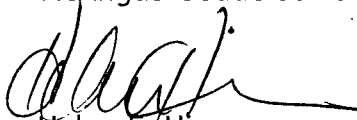
Enclosed for filing please find the following documents:

1. the original and one copy of the Initial Brief of Respondents;
2. the original and one copy of the Respondents' Designation of Matter to be Included in the Record on Appeal; and
3. the original and one copy of Respondents' Proof of Service concerning items one and two.

Please file these documents and return the clocked-in copies in the enclosed, self-addressed stamped envelope.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: John C. McDaniel, *Pro Se*

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**20638.12027/HFH/jlr**  
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