

**Carmelo B. Sammataro**

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

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

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

November 10, 2014

**RECEIVED**

NOV 10 2014

**SC Court of Appeals**

**VIA HAND DELIVERY**

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

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:

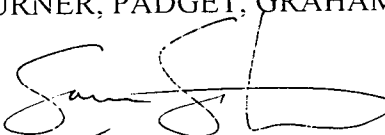
1. Two copies of my correspondence of even date to Appellant forwarding additional copies of designated documents; and
2. Original and one copy of the Proof of Service regarding documents produced to Appellant.

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

# TURNER PADGET

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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.)

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court Of Common Pleas

Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2013-000887

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**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.

PROOF OF SERVICE

I certify this 10th day of November 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 1, 3, 6, 7, 8, 9, 11, 12, 14, 15, 18, 19, 20 and 21, 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**

November 10, 2014

By:



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Michael E. Chase (Bar No. 15230)  
Carmelo B. Sammataro (Bar No. 69746)  
TURNER PADGET GRAHAM & LANEY P.A.  
Post Office Box 1473  
Columbia, SC 29202  
Phone: (803) 254-2200  
Fax: (803) 799-3957

ATTORNEYS FOR RESPONDENTS  
PALMETTO HEALTH RICHLAND AND KEY  
RISK MANAGEMENT SERVICES, INC.

**Carmelo B. Sammataro**  
E-mail: [SSammataro@TurnerPadget.com](mailto:SSammataro@TurnerPadget.com)  
Writer's Direct Dial: (803) 227-4253  
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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 email of November 9, 2014, requesting copies of additional documents for inclusion in the Record on Appeal. Following is a list of all documents identified in Respondents' Amended Designation of Matter. This list indicates which documents have previously been copied to you, as well as those enclosed with this letter.

Amended Designation of Matter No.	Document Identified	Copies Enclosed
1.	June 20, 2014 Motion Order of Commissioner Roche (WCC Claim No. 0217755);	Yes (4 pages)
2.	March 26, 2013 Order of the Circuit Court (WCC Claim No. 9503744) (WCC Claim No. 0126962) (WCC Claim No. 0217755) (WCC Claim No. 0227098) (WCC Claim No. 0321756) (WCC Claim No. 0616756);  <i>[These documents were sent to you on 10/7/14, 10 pages.]</i>  <i>[These documents were sent <u>a second time</u> to you on 11/5/14, 10 pages.]</i>	No

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3.	May 3, 2011 Order of the Full Commission (WCC Claim No. 9503744) (WCC Claim No. 0126962) (WCC Claim No. 0217755) (WCC Claim No. 0227098) (WCC Claim No. 0321756) (WCC Claim No. 0322274) (WCC Claim No. 0616756);	Yes (15 pages)
4.	July 9, 2010 Order of the Circuit Court;  <i>[These documents were sent to you on 10/7/14, 2 pages.]</i>  <i>[These documents were sent <u>a second time</u> to you on 11/5/14, 2 pages.]</i>	No
5.	December 6, 2007 Decision and Order of the Full Commission;  <i>[These documents were sent to you on 10/7/14, 6 pages.]</i>  <i>[These documents were sent <u>a second time</u> to you on 11/5/14, 6 pages.]</i>	No
6.	October 23, 2007 Order of the single commissioner (WCC Claim No. 9503744) (WCC Claim No. 0126962) (WCC Claim No. 0217755) (WCC Claim No. 0227098) (WCC Claim No. 0321756) (WCC Claim No. 0616756);	Yes (30 pages)
7.	August 24, 1995 Consent Order (WCC Claim No. 9503744);	Yes (3 pages)
8.	April 3, 2014 Reply to Claimant's Motion for Sanctions and/or Motion to Dismiss for Lack of Subject Matter Jurisdiction (WCC Claim No. 0217755);	Yes (6 pages)
9.	April 2, 2014 Motion for Sanctions for Non-Compliance with Payment of Statutory Benefits (WCC Claim No. 0217755);	Yes (2 pages)

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10.	November 5, 2007 letter from Claimant re: new evidence motion, with attached motion;  <i>[These documents were sent to you on 10/7/14, 27 pages.]</i>  <i>[These documents were sent <u>a second time</u> to you on 11/5/14, 27 pages.]</i>	No
11.	August 24, 2007 Form 51, Employer's Answer (WCC Claim No. 9503744);	Yes (1 page)
12.	August 8, 2007 Form 51, Employer's Answer (WCC Claim No. 0126962);	Yes (1 page)
13.	August 8, 2007 Form 51, Employer's Answer (WCC Claim No. 0217755);  <i>[These documents were sent to you on 10/22/14, 1 page.]</i>	No
14.	August 8, 2007 Form 51, Employer's Answer (WCC Claim No. 0227098);	Yes (1 page)
15.	August 8, 2007 Form 51, Employer's Answer (WCC Claim No. 0322274);	Yes (1 page)
16.	July 23, 2007 Form 50, Request for Hearing (WCC Claim No. 9503744);  <i>[These documents were sent to you on 10/22/14, 4 pages.]</i>	No
17.	November 13, 2006 Form 51, Employer's Answer (WCC Claim No. 0616756);  <i>[These documents were sent to you on 10/22/14, 1 page.]</i>	No
18.	October 19, 2006 Form 50, Request for Hearing (WCC Claim No. 0217755);	Yes (3 pages)

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19.	October 18, 2006 Form 50, Request for Hearing (WCC Claim No. 0126962);	Yes (4 pages)
20.	October 9, 2006 Form 50, Request for Hearing (WCC Claim No. 0227098);	Yes (1 page)
21.	October 7, 2006 Form 50, Request for Hearing (WCC Claim No. 0322274);	Yes (5 pages)
22.	October 7, 2006 Form 50, Request for Hearing (WCC Claim No. 0616756);  <i>[These documents were sent to you on 11/5/14, 4 pages.]</i>	No
23.	March 10, 2006 Form 51, Employer's Answer (WCC Claim No. 0321756);  <i>[These documents were sent to you on 11/5/14, 2 pages.]</i>	No
24.	October 18, 2005 Form 50, Request for Hearing (WCC Claim No. 0321756);  <i>[These documents were sent to you on 10/22/14, 4 pages.]</i>  <i>[These documents were sent <u>a second time</u> to you on 11/5/14, 4 pages.]</i>	No
25.	November 1, 2012 hearing transcript;  <i>(This transcript must be obtained from the court reporter.)</i>	No
26.	September 4, 2007 hearing transcript (WCC Claim No. 9503744);  <i>(This transcript must be obtained from the court reporter.)</i>	No

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27.	Respondents Palmetto Health Richland and Key Risk Management Services, Inc.'s APA pp. 1-109; 1-161 (WCC Claim No. 0321756); pp. 1-21 (WCC Claim No. 0616756);  <i>[These documents were sent to you on 10/7/14, 137 pages w/o errata sheets + errata sheets 161 pages = 298 total pages.]</i>  <i>[These documents were sent (w/o errata sheets) <u>a second time</u> to you on 11/5/14, 137 pages]</i>	No
28.	Respondents Palmetto Health Richland and Palmetto Hospital Trust Services' APA pp. 1-30 (WCC Claim No. 0126962); pp. 1-17 (WCC Claim No. 0217755); pp. 1-8 (WCC Claim No. 0227098); pp. 1-17 (WCC Claim No. 0322274); and  <i>[These documents were sent to you on 10/7/14, 84 pages.]</i>  <i>[These documents were sent <u>a second time</u> to you on 11/5/14, 84 pages.]</i>	No
29.	Respondents Trident Regional Medical Center and Zurich American Insurance Company's APA pp. 9-38, 106 (WCC Claim No. 9503744 ).  <i>[These documents were sent to you on 10/7/14, 32 pages.]</i>  <i>[These documents were sent <u>a second time</u> to you on 11/5/14, 32 pages.]</i>	No

Also enclosed for your quick reference is another copy of Respondents' Amended Designation of Matter that was filed with the Court and served upon you on October 7, 2014.

It is important for you to note that upon your receipt of the enclosed tabbed documents, we would have provided to you **a complete copy set of ALL documents identified in Respondents' Amended Designation of Matter** (with the exception of transcripts). To date, we have provided you with 854 pages at a copying expense of approximately \$175.00. **THEREFORE, NO FURTHER DOCUMENT COPIES WILL BE FORTHCOMING WITHOUT COURT ORDER.**

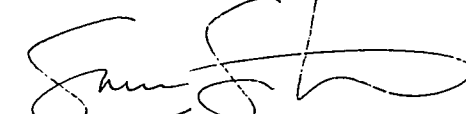
November 10, 2014

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With kind regards, I am

Very truly yours,

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



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CBS/tj

Enclosures

cc: The Honorable Jenny Abbott Kitchings, Clerk  
Lana H. Sims, Jr., Esquire  
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