

# TURNER PADGET

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**Carmelo B. Sammataro**

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November 6, 2014

**RECEIVED**

NOV 06 2014

**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 emails of November 4, 2014, requesting another copy set of the documents that we previously forwarded to you on October 7th (less the errata sheets), as well as copies of additional documents for inclusion in the Record on Appeal. Following is a list of those documents that we believe to be responsive to your requests.

Amended Designation of Matter No.	Document Identified	Copies Enclosed
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 also sent to you on 10/7/14.]</i>	Yes (10 pages)
4.	July 9, 2010 Order of the Circuit Court;  <i>[These documents were also sent to you on 10/7/14.]</i>	Yes (2 pages)
5.	December 6, 2007 Decision and Order of the Full Commission;  <i>[These documents were also sent to you on 10/7/14.]</i>	Yes (6 pages)

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10.	November 5, 2007 letter from Claimant re: new evidence motion, with attached motion;  <i>[These documents were also sent to you on 10/7/14.]</i>	Yes (27 pages)
22.	October 7, 2006 Form 50, Request for Hearing (WCC Claim No. 0616756);	Yes (4 pages)
23.	March 10, 2006 Form 51, Employer's Answer (WCC Claim No. 0321756);	Yes (2 pages)
24.	October 18, 2005 Form 50, Request for Hearing (WCC Claim No. 0321756);  <i>[These documents were also sent to you on 10/22/14.]</i>	Yes (4 pages)
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 and the errata sheets were also sent to you on 10/7/14.]</i>	Yes (137 pages, w/o errata sheets)
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 also sent to you on 10/7/14.]</i>	Yes (84 pages)
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 also sent to you on 10/7/14.]</i>	Yes (32 pages)

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We would like to bring to your attention that 302 pages of the total 308 pages enclosed herein are duplicate copies of documents that we previously forwarded to you in October 2014. Please note that it is your responsibility to maintain the document copies that we provide. **Therefore, in the future, we cannot forward duplicate copies without court order.** 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

APPEAL FROM RICHLAND COUNTY  
Court Of Common Pleas

Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2013-000887

**RECEIVED**

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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 6th 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 2, 4, 5, 10, 22, 23, 24, 27, 28, and 29, 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 6, 2014

By: Carmelo B. Sammataro/by Awk

Michael E. Chase (Bar No. 15230)

Carmelo B. Sammataro (Bar No. 69746)

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

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November 6, 2014

**VIA HAND DELIVERY**

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

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NOV 06 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 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 / by AWK*

Carmelo B. Sammataro

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Allison M. Carter, Esquire  
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