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NOV 17 2014

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION
APPELLATE PANEL

Avery B. Wilkerson, Jr., Commissioner;
Andrea C. Roche, Commissioner, and T. Scott Beck, Commissioner, concurring

74170

S.C.W.C.C. Case No.: 1108188

Russell GoodwinAppellant,

v.

Employbridge dba Prologistix, Employer, and American Casualty Company of
Reading PA, CarrierRespondents.

MOTION TO RECONSIDER

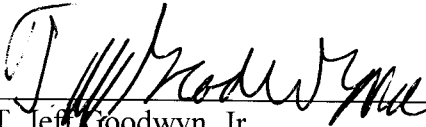
An Order was entered by this Court on November 5, 2014 for the above referenced claim, denying Appellant's request for a tolling of the deadline under the Americans with Disabilities Act to file a notice of appeal.

Appellant requested this Court toll the deadline pursuant to the Americans with Disabilities Act (ADA) and find the Appellant *non compos mentis*. In its dismissal of Appellant's motion to file his notice of appeal out of time, this Court did not specifically address the applicability of the ADA or determine whether Appellant was *non compos mentis*.

WHEREFORE, for the above reasons, the Appellant respectfully request this Court reconsider the arguments put forth and specifically address the applicability of the ADA to this case.

- signature page to follow -

November 12, 2014


T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, South Carolina 29205
(803) 251-4517
Attorney for Appellant

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S.C.W.C.C. Case No.: 1108188
Appellate Case No.: 2014-001676

Russell GoodwinAppellant,

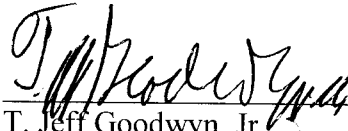
v.

Employbridge dba Prologistix, Employer, and American Casualty Company of
Reading PA, CarrierRespondents.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion to Reconsider on Justin T. Williams, Esquire and John G. Coggiola, Esquire, Attorneys for the Respondents at Willson, Jones, Carter & Baxley, P.A., 4500 Fort Jackson Blvd., Columbia, SC 29209 by depositing a copy of same in the United States Mail, postage prepaid, on November 2, 2014.

GOODWYN LAW FIRM, LLC



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2519 Devine Street, Suite A
Columbia, South Carolina 29205
JGoodwyn@goodwynlaw.com
Attorney for Appellant

November 12, 2014

GOODWYN LAW FIRM, LLC

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Special Counsel:
Rachel G. Peavy

*Also Licensed in Georgia

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November 12, 2014

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

RE: ***Russell Goodwin v. Employbridge dba Prologistix and American Casualty
Company of Reading PA***
WCC File No.: 1108188
Appellate Case No.: 2014-001676
Our File No.: 7000-0097

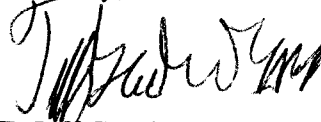
Dear Ms. Kitchings:

Enclosed for filing, please find an original and one copy of a Motion to Reconsider along with a check in the amount of \$25.00 for the filing fees in regard to the above-referenced matter. Please file the original with the Court and return a clocked copy to me in the self-addressed stamped envelope provide.

By copy of this letter to all parties' counsel, I am serving them with a copy of same.

Should you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/msb
Enclosures

cc: Justin T. Williams, Esquire
John G. Coggiola, Esquire
Russell Goodwin

Goodwyn Law Firm, LLC
T. Jeff Goodwyn, Jr. Esq.
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Columbia, S.C. 29205

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

