

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 0717624

Appellate Case No. 2014-002354

Hector G. Fragosa, Employee/Claimant, Appellant,

v.

Kade Construction, LLC, Employer, and Key Risk Management Services, Inc., Carrier,
..... Respondents.

**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Appellant proposes the following be included in the Record on Appeal:


1. Form 50, dated April 8, 2011.
2. Form 51, dated April 19, 2011.
3. Form 58 (Claimant).
4. Single Commissioner Order, dated November 21, 2011.
5. Full Commission Order, dated May 23, 2012.
6. Opinion, Court of Appeals, 2013.
7. Petition for Rehearing, dated December 12, 2013.
8. Reply to Return to Petition for Rehearing, dated December 31, 2013.

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9. Order Denying Petition for Rehearing, dated March 31, 2014.
10. Petition for Writ of Certiorari, dated April 30, 2014.
11. Order Denying Petition for Writ of Certiorari, dated July 24, 2014.
12. Remittitur, dated August 2, 2014.
13. Full Commission Order, dated September 30, 2014.
14. Transcript of Hearing, dated June 28, 2011.
15. Transcript of Hearing, March 19, 2012.
16. Deposition of George Sandoz, MD, dated August 6, 2010.
17. Claimant's APA Submissions.
18. Claimant's Exhibits.
19. Defendants' APA Submissions, pages 590-595, 599-600, 610-616, 641-642, 646.
20. Brief of Appellant to the Court of Appeals.
21. Reply Brief of Appellant to the Court of Appeals.
22. Brief of Respondent to the Court of Appeals.

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

Respectfully Submitted



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Columbia, South Carolina
February 9, 2015

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Kade Construction, LLC, Employer, and Key Risk Management Services, Inc.,
Carrier, Respondents.

PROOF OF SERVICE

I certify that I, Katherine Carter, am a paralegal to Stephen B. Samuels and I have caused the **Initial Brief of Appellant and Designation of Matter** to be served on the parties below, by placing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed as follows:

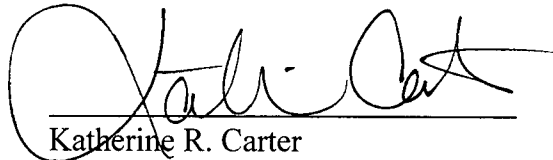
Michael W. Burkett, Esquire
J. Gabriel Coggiola, Esquire
Willson Jones Carter & Baxley, P.A.
4500 Fort Jackson Boulevard
Columbia, South Carolina 29209

The Honorable Amy Bracy
Judicial Director
S.C. Workers' Compensation Commission
Post Office Box 1715
Columbia, South Carolina 29202-1715

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STEPHEN B SAMUELS
ATTORNEY AT LAW

February 9, 2015

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Via Hand Delivery

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

RE: Hector G. Fragosa v. Kade Construction, LLC, et al
Appellate Case No.: 2014-002354

Dear Ms. Kitchings:

Enclosed for filing are the original and four (4) copies of the **Initial Brief of Appellant and Designation of Matter and Proof of Service**, in the above case.

Please have your staff clock in the Initial Brief of Appellant, Designation of Matter and Proof of Service and return the clocked copies to my courier

Sincerely,
SAMUELS LAW FIRM, LLC

Katherine R. Carter
Paralegal for Stephen B. Samuels

SBS/krc
Enclosures

cc: Michael W. Burkett, Esquire
Amy Bracy, SCWCC
Jeffrey C. Chandler, Esquire

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