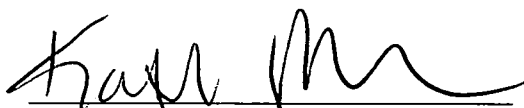


was the result of an accidental filing error rather than an intentional failure to comply. Additionally, the Appellants have not been prejudiced in any way as they were copied on our initial filing mailed timely on January 20, 2015 to the Full Commission in error.

Respectfully submitted,

WILLSON JONES CARTER & BAXLEY, P.A.

A handwritten signature in black ink, appearing to read 'Katharine D. Phipps', written over a horizontal line.

Katharine D. Phipps, Esquire
872 S. Pleasantburg Drive
Greenville, SC 29607
Attorneys for Defendants

Date: February 9, 2015

BEFORE THE SOUTH CAROLINA

COURT OF APPEALS

APPELLATE CASE NO. 2014-001503

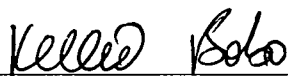
Rusty Lowery,)
Employee,)
Claimant,)
)
vs.)
)
Pioneer Associates,)
)
Employer,)
and)
)
Chartis Casualty Co,)
)
Carrier,)
Defendants.)

CERTIFICATE OF SERVICE

I, Kellie J. Bobo, do hereby certify that I am the Legal Assistant for Katharine D. Phipps, Esquire, attorney for the defendants with **WILLSON JONES CARTER & BAXLEY, P.A.** in Greenville, South Carolina, and that on the 9th day of February, 2015, I mailed the foregoing MOTION TO REQUEST PERMISSION TO FILE RESPONDENTS INITIAL BRIEF AND DESIGNATION OF MATTER OUT-OF-TIME to the following by placing a copy thereof in the United States mail, first class, proper postage affixed thereto:

Chadwick D. Pye, Esquire
 Chadwick D. Pye, LLC
 213 Magnolia Street, PO Box 6346
 Spartanburg, SC 29304

David A. Wilson, Esquire
 The Law Offices of David A. Wilson, LLC
 200 Whitsett Street, Suite B
 Greenville, SC 29601



 Kellie J. Bobo
 Legal Assistant to Katharine D. Phipps, Esquire
WILLSON JONES CARTER & BAXLEY, P.A.

Attachment A

WILLSON JONES CARTER & BAXLEY, P.A.

ATTORNEYS AT LAW

GREENVILLE CHARLESTON COLUMBIA CHARLOTTE RALEIGH ATLANTA

Katharine D. Phipps
Direct (864) 272-2661
Fax (864) 235-6015
kdhipps@wjlaw.net

872 S. Pleasantburg Drive
Greenville, SC 29607
www.wjcbaw.net

January 20, 2015

Ms. Amy Bracy
Judicial Director
South Carolina Workers' Compensation Commission
P.O. Box 1715
Columbia, SC 29202-1715

Re: Rusty Lowery vs. Pioneer Associates
WCC File No.: 1008485 DOI: 7/9/2010
Carrier: Chartis Casualty Co - Claim No.: 709-861827
WJC&B File No.: 0175.00079

Dear Ms. Bracy:

Enclosed please find the original and three copies of the Brief of Defendants/Respondents, including a Certificate of Service indicating that a copy of the Brief has been served on claimant's attorney, in the above-referenced matter.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

Katie Phipps

Katharine D. Phipps

KDP/kjb

Enclosures

cc (w/enclosure): Chadwick D. Pye, Esquire
David A. Wilson, Esquire
Ms. Tracy A. Dean (via e-mail)