

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Case No.: 2014-001197

Brenda Oswald,
Employee.....Appellant.

v.

Oswald Law Firm, Employer,
and Norguard Insurance Company, Carrier.....Respondents.

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

Peter P. Leventis, IV
Post Office Box 7212
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(803) 256-4645
Attorneys for Respondents Oswald Law
Firm, and NorGuard Insurance

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Pursuant to Rule 209, SCACR, the Respondents, Oswald Law Firm and NorGuard designate the following fifteen (15) items to be included in the Record on Appeal, in addition to the ten (10) items already proposed by the Appellant Brenda Oswald in her Designation dated December 17, 2014:

1. Deposition transcript of Brenda Oswald dated 07/10/12 (Exhibit No. 21 of the Defendants/Respondents for the March 21, 2013 hearing).
2. Deposition Transcript of Charles Riggins dated 11/20/12 (Exhibit No. 23 of the Defendants/Respondents for the March 21, 2013 hearing).

3. Medical Records of Mid-Carolina Internal Medicine dated 09/11/01 – 04/23/12 (APA No. 6 of the Defendants/Respondents for the March 21, 2013 hearing, pages 80 – 108).

4. Medical Records of Lexington Medical Center dated 06/05/2008 (APA No. 7 of the Defendants/Respondents for the March 21, 2013 hearing, pages 109-109E).

5. Medical Records of Sunset Family Practice dated 08/12/08 – 12/14/10 (APA No. 8 of the Defendants/Respondents for the March 21, 2013 hearing, pages 110 – 122).

6. Medical Records of Lexington Medical Center Radiology dated 08/15/08 (APA No. 9 of the Defendants/Respondents for the March 21, 2013 hearing, page 123).

7. Medical Records of Ellis Physical Therapy dated 09/2/2008 (APA No. 10 of the Defendants/Respondents for the March 21, 2013 hearing, pages 124 – 125).

8. Claimant's/Appellant's payroll records from the Oswald Law Firm (Exhibit No. 11 of the Defendants/Respondents for the March 21, 2013 hearing, pages 126 – 141).

9. SC Department of Employment & Workforce records of the Claimant/Appellant (Exhibit No. 12 of the Defendants/Respondents for the March 21, 2013 hearing, pages 142 – 156).

10. Maps of Claimant resident & alleged driving routes (Exhibit No. 13 of the Defendants/Respondents for the March 21, 2013 hearing, pages 157 – 158).

11. SC Traffic Collision Report dated 09/27/10 (Exhibit No. 14 of the Defendants/Respondents for the March 21, 2013 hearing, pages 159 – 160).

12. Official 10 Year Driving Record of the Claimant/Appellant (Exhibit No. 15 of the Defendants/Respondents for the March 21, 2013 hearing, pages 161 – 163).

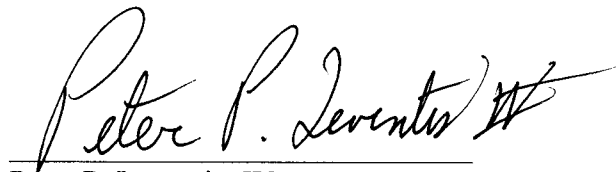
13. Public records regarding Claimant's/Appellant's real estate license (Exhibit No. 17 of the Defendants/Respondents for the March 21, 2013 hearing, pages 174 – 177).

14. Maps of Claimant's/Appellant's Residence and Neighborhood (Exhibit No. 19 of the Defendants/Respondents for the March 21, 2013 hearing, pages 184 – 186).

15. Additional maps detailing the alleged route of the Claimant (Exhibit No. 20 of the Defendants/Respondents for the March 21, 2013).

Pursuant to Rule 209(c), SCACR, the undersigned certifies that this designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted,



Peter P. Leventis, IV
Post Office Box 7212
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Attorneys for Respondents Oswald Law
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February 17, 2015

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PROOF OF SERVICE

I certify that I have served the Designation of Matter to Be Included in the Record on Appeal of Respondents upon counsels for the Appellant, Brenda Oswald, by depositing a copy of it in the United States Mail, postage prepaid, on February 17, 2015, addressed to the attorneys of records respectively Frank A. Barton Esquire, P.O. Box 3972 West Columbia, SC 29170, and H. Wayne Floyd, Esquire, Wayne Floyd Law Firm, P.O. Box 3972, West Columbia, SC 29170.



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February 17, 2015

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February 17, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street, Suite 200
Post Office Box 11629
Columbia, SC 29201

Re: *Branda Oswald v. Oswald Law Firm*

Case No: 2014-001197
Our File No.: 1700-0294

Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the Designation of Matter to Be Included in the Record on Appeal, along with the Proof of Service, in the above-referenced matter. Please return the additional clocked-in copy with the self-addressed stamped envelope included for your convenience.

By copy of this letter and as evidenced by the attached Proof of Service, I am serving a copy of the Designation of Matter to all parties.

Sincerely,



Peter P. Leventis, IV

PPL/ecs

Enclosures

cc: Frank A. Barton, Esquire (w/encl)
Wayne Floyd, Esquire (w/encl)
Amy Klatt (w/encl)

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SC Court of Appeals

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