

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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MAR 09 2015

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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**SC Court of Appeals**

W.C.C. File No.: 1204039

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William Lee Turner, Employee, ..... Appellant,

v.

SAIIA Construction, Employer, and  
Old Republic General Insurance Corporation  
c/o Gallagher Bassett Services, Inc., Carrier, ..... Respondents.

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

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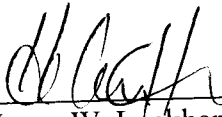
Respondents propose the following be included in the Record on Appeal:

1. Decision and Order of the Single Commissioner, filed April 14, 2014;
2. Appellate Panel Decision and Order of the South Carolina Workers' Compensation Commission, filed Oct. 10, 2014;
3. Claimant's Form 50, dated Nov. 25, 2013;
4. Defendants' Form 51, dated Dec. 5, 2103;
5. Claimant's Form 30 with Attachment, dated April 28, 2014;
6. Request for a Proposed Decision and Order, dated August 29, 2014;
7. Cl. Notice of Appeal, dated Nov. 6, 2014;
8. Transcript of Hearing before Single Commissioner Susan S. Barden, held Aug. 20, 2012;
9. Transcript of Full Commission Hearing before Commissioners Wilkerson, McCaskill and James, on August 11, 2014;

10. Transcript of 2012 Deposition of William Lee Turner;
11. Transcript of 2014 Deposition of William Lee Turner;
12. Transcript of Deposition of Paul Barnette;
13. Transcript of Deposition of David Bolden;
14. Transcript of Deposition of James Speegle;
15. Claimant APA, pp. 1-11, 20-23, 25, 37; and
16. Defendant APA, pp. 1-19, 16, 18, 25-32.

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

March 6, 2015

  
\_\_\_\_\_  
Jason W. Lockhart  
S.C. Bar No.: 68612  
Meridian 10<sup>th</sup> Floor  
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S.C. Bar No.: 76124  
735 Johnnie Dodds Blvd., Suite 200  
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(843) 576-2900

*Attorneys for Respondents SAIIA Construction and  
Old Republic General Insurance Corporation c/o  
Gallagher Bassett Services, Inc.*

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In The Court of Appeals

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W.C.C. File No.: 1204039

William Lee Turner, Employee, .....Appellant,

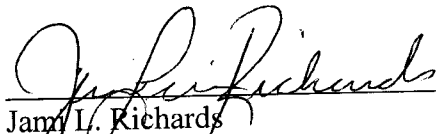
v.

SAIIA Construction, Employer, and  
Old Republic General Insurance Corporation  
c/o Gallagher Bassett Services, Inc., Carrier, ..... Respondents.

**PROOF OF SERVICE**

I certify that on the 6<sup>th</sup> day of March 2015, I served the **Initial Brief of Respondents** and **Designation of Matter** on William Lee Turner by depositing a copy of it in the United States Mail, postage prepaid, addressed to his attorney of record:

Preston F. McDaniel, Esq.  
MCDANIEL LAW FIRM  
1315 Elmwood Avenue  
Columbia, SC 29201



Jami L. Richards  
Legal Assistant to Helen F. Hiser  
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*Attorneys for Respondents SAIIA Construction and  
Old Republic General Insurance Corporation c/o  
Gallagher Bassett Services, Inc.*

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**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

March 6, 2015

**Via U.S. Mail**

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

RE: William Lee Turner v. SAIIA Construction and Old Republic General  
Insurance Corporation c/o Gallagher Bassett Services, Inc.  
Date of Accident: April 19, 2012  
WCC File No.: 1204039  
Our File No.: 2098.12265  
Claim No.: 002979-030511-WC-01  
Appeal No.: 2014-002416

Dear Ms. Kitchings:

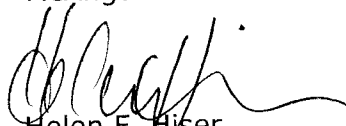
Enclosed for filing please find the following documents:

1. original and one copy of the Initial Brief of Respondents;
2. original and one copy of the Designation of Matter to be Included in the Record on Appeal; and
3. original and one copy of Respondents' Proof of Service concerning items one and two.

Please file these documents and return the clocked-in copies in the enclosed, self-addressed stamped envelope. If you have any questions, please contact me.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: Preston F. McDaniel, Esq.

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**2098.12265/HFH/jlr**  
The Honorable Jenny Abbott Kitchings  
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