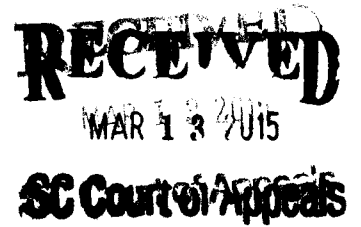


THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals



APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No.: 0717624

Hector G. Fragosa, (Employee/Claimant), .....Appellant,  
v.  
Kade Construction, LLC (Employer) and  
Key Risk Management Services, Inc. (Carrier), ..... Respondents.

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

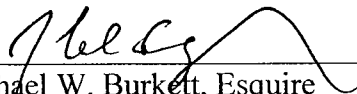
In addition to the materials designated by Appellant, Respondents propose that the following materials be included in the record on appeal for this case:

1. Defendants Form 21 filed March 25, 2011
2. Defendants' APA Submissions.

I certify that this designation contains no matters which are irrelevant to this appeal.

Respectfully Submitted,

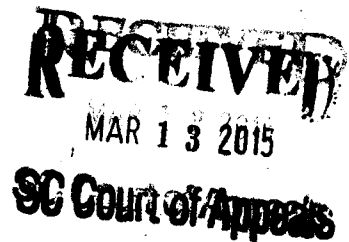
**WILLSON, JONES, CARTER & BAXLEY, P.A.**

  
\_\_\_\_\_  
Michael W. Burkett, Esquire  
J. Gabriel Coggiola, Esquire  
Willson, Jones, Carter & Baxley, P.A.  
4500 Fort Jackson Boulevard  
Columbia, South Carolina 29209  
(803) 227-2889  
Attorneys for Respondents

March 11, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission



WCC File No.: 0717624

Hector G. Fragosa, (Employee/Claimant), .....Petitioner,  
v.  
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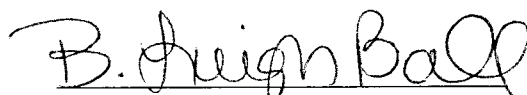
**PROOF OF SERVICE**

I certify that I, Leigh Ball, legal assistant to J. Gabriel Coggiola, have properly served **Respondents' Initial Brief**, by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Stephen B. Samuels  
Samuels Law Firm, LLC  
1320 Richland Street  
Columbia, SC 29201  
Attorney for the Petitioner

Jeff. C. Chandler  
Chandler Law  
Bank of America Building  
2501 Oak Street  
Myrtle Beach, SC 29578  
(843) 448 – 4357  
Attorney for Petitioner

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

A handwritten signature in black ink that reads "B. Leigh Ball". The signature is written in a cursive style with a horizontal line underneath the name.

B. Leigh Ball, Legal Assistant  
Willson, Jones, Carter & Baxley  
4500 Fort Jackson Blvd.  
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March 11, 2014  
Columbia, South Carolina

WILLSON JONES CARTER & BAXLEY, P.A.

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SC Court of Appeals

March 11, 2015

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

Re: Hector Fragosa vs. Kade Construction, LLC  
WCC File No.: 0717624  
DOI: 11/1/2007  
Appellate Case No.: 2014-002354

Dear Ms. Kitchings:

Pursuant to Rules 208 and 209, SCACR, please find enclosed for filing one copy of the Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal, along with Proof of Service for the same.

By copy of this letter, I am also serving a copy of the Respondent's Initial Brief and Respondent's Designation of Matter to be Included in the Record on Appeal on the attorneys for the Appellant. I would also appreciate you returning a clocked copy to me in the self-addressed stamped envelope that I have provided.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.



John Gabriel Coggiola

JGC/jgc  
Enclosure

cc: Mr. Stephen B. Samuels, Esquire  
Mr. Jeffrey C. Chandler, Esquire  
Robert Parkins (via email)