

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

The Honorable W. Jeffrey Young, Circuit Court Judge

C.A. No.: 2013-CP-43-02284
Appellate Case No. 2014-002215
WCC File No · 9930459

RECEIVED
MAR 25 2015
SC Court of Appeals

75487

Arrowpoint Capital Corporation/Arrowood Indemnity Co., Carrier Appellant,

v.

South Carolina Second Injury Fund, Carrier Respondent,

In re

Mary McConico, Employee/Claimant

v.

Yuasa-Exide, Inc., Employer and Arrowpoint Capital Corp./Arrowood Indemnity Co., Carrier.

**MOTION TO PROVIDE FEWER
COPIES OF RECORD ON APPEAL**

TO: THE HONORABLE JENNY ABBOTT KITCHINGS, CLERK OF COURT, SOUTH CAROLINA COURT OF APPEALS; and TIMOTHY B. KILLEN, ESQUIRE, ATTORNEY FOR SOUTH CAROLINA SECOND INJURY FUND, RESPONDENT

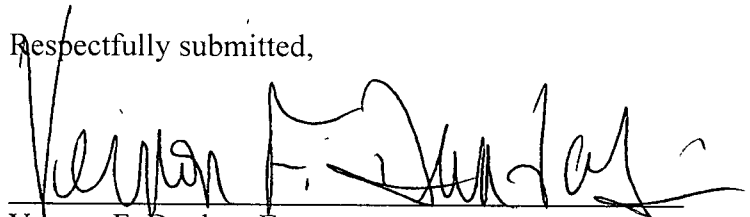
YOU WILL PLEASE TAKE NOTICE Appellant, Arrowpoint Capital Corporation/Arrowood Indemnity Company, respectfully submits this Motion to provide fewer than fifteen (15) copies of the Record on Appeal for Consideration. The grounds for Appellant's Motion are as follows:

- 1 Pursuant to Rule 210 of the South Carolina Appellate Court Rules, Appellant must file with the Clerk of Court of the South Carolina Court of Appeals, fifteen (15) copies of the Record on Appeal no later than the date of Appellant's Final Briefs as due designated pursuant to Rule 211 of the South Carolina Appellate Court Rules
2. It is Appellant's understanding that the Court may not require fifteen (15) copies of the Record on Appeal in its review of the case. The requirement of providing the Court with fifteen (15) copies of the Record on Appeal as stated in Rule 211 of the South Carolina Court of Appeals appear to be subject to modification because of the Court's new electronic system of uploading the Record on Appeal.
- 3 The Record on Appeal in this case is approximately 425 pages. Additionally, Appellant has appealed two other companion matters involving the Respondent with regard to its request for Second Injury Fund reimbursement. The companion cases have approximately the same number of pages contained in the corresponding Records on Appeal. Hence, Appellant's submit that the cost of producing this Record on Appeal along with the Records on Appeal in the companion cases, are quite substantial
- 4 Appellant respectfully request that it be permitted to provide fewer than fifteen (15) copies of the Record on Appeal

For the reasons set forth above, Appellant respectfully requests that it be permitted to provide fewer than fifteen (15) copies of the Record on Appeal.

March 23, 2015

Respectfully submitted,



Vernon F. Dunbar, Esquire
McAngus Goudelock and Courie
55 East Camperdown Way, Suite 300
Greenville, SC 29601
Telephone: 864-239-4000
Email: vernon.dunbar@mgclaw.com
Attorney for Appellant

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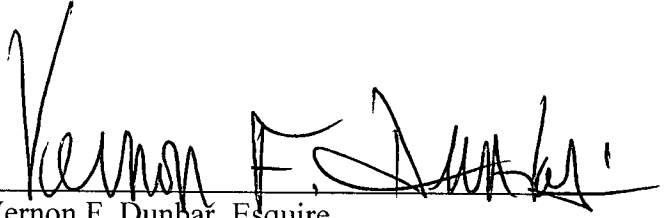
Mary McConico, Employee/Claimant

v.

Yuasa-Exide, Inc., Employer and Arrowpoint Capital Corp./Arrowood Indemnity Co.,

PROOF OF SERVICE

I certify that I have served the Motion to Provide Fewer Copies of Record on Appeal on Timothy Killen, Attorney for the South Carolina Second Injury Fund by depositing a copy of it in the United States Mail, postage prepaid, on March 23, 2015, addressed to Timothy Killen, Wilson, Jones, Carter & Baxley, 4500 Fort Jackson Boulevard, Columbia, South Carolina 29209.

A handwritten signature in black ink, appearing to read "Vernon F. Dunbar". The signature is written in a cursive style with a prominent vertical stroke at the beginning.

Vernon F. Dunbar, Esquire

S.C. Bar No.: 7836

McAngus, Goudelock & Courie LLC

55 East Camperdown Way, Suite 300 (29601)

Post Office Box 2980

Greenville, South Carolina 29602

(864) 239-6735

Attorney for Appellant

Reply To

VERNON F. DUNBAR
Direct Dial (864) 239-6735
vernon.dunbar@mgclaw.com

March 23, 2015

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MAR 25 2015
SC Court of Appeals

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

RE: Arrowpoint Capital Corporation v SC Second Injury Fund
Mary McConico v Yuasa-Exide and Arrowpoint Capital Corporation
Appellate Case No. 2014-002215
Lower Court No. 2013-CP-43-02284
Our File No.: 20113.14073

Dear Ms. Kitchings:

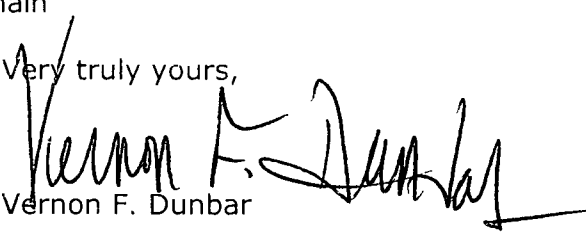
Please find enclosed a Motion requesting permission to provide fewer than fifteen (15) copies of the Record on Appeal filed by Appellant, Arrowpoint Capital Corporation/Arrowood Indemnity Company. In accordance with the Court rules, I am hereby filing the original and seven (7) copies of said Motion.

Please return a filed and stamped copy of this Motion to me in the self-addressed and stamped envelope, which I have enclosed for your use. Additionally, I am enclosing the required \$25.00 filing fee for this Motion.

By copy of this letter to Timothy Killen, Attorney for Respondent, South Carolina Second Injury Fund, I am apprising him of my communication with you and serving a copy of this Motion upon him.

With kind and warm regards, I remain

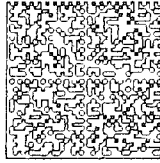
Very truly yours,


Vernon F. Dunbar

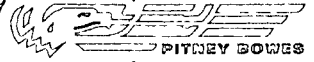
VFD/rhd

Enclosures: Motion to Provide Fewer Copies of Record on Appeal
Proof of Service
Filing Fee / SASE

cc: Timothy Killen, Wilson, Jones, Carter & Baxley (w/enclosures)
Eric Rowell, Arrowpoint Capital Corp (w/enclosures) **SENT VIA EMAIL**
Staci Elrod (w/enclosures) **SENT VIA EMAIL**



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MAR 23 2015

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able Jenny A. Kitchings

olina Court of Appeals

ter Street

SC 29201

