

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Appeal from the South Carolina Workers' Compensation Commission

S.C. Supreme Court

Opinion No. 27516 (S.C. Sup. Ct. filed April 22, 2015)

Ricky Rhame,

Petitioner,

v.

Charleston County School District,

Respondent,

PETITION FOR REHEARING

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COMES NOW the Respondent, Charleston County School District (“School District”), by and through its attorneys, pursuant to Rule 221, SCACR, and, upon the grounds set forth herein, hereby petitions this Honorable Court for rehearing of this appeal, which the Court decided via published opinion filed April 22, 2015, specifically, Ricky Rhame v. Charleston County School District, Op. No. 27516 (S.C. Sup. Ct. filed April 22, 2015) (Shearouse Adv. Sh. No. 16 at 22).

INTRODUCTION

Most respectfully, rehearing should be granted. The Court’s opinion overlooked and misapprehended a number of material points—chief among them, that the statute outlining the procedures for judicial review of an administrative decision confers the South Carolina Workers’ Compensation Commission’s Appellate Panel with the authority to entertain petitions for rehearing and that the Commission’s regulation support the Appellate Panel’s authority to entertain a motion on the merits, including a petition for rehearing—resulting in unfair prejudice to the School District via the erroneous remand of this appeal to the Court of Appeals. More broadly, left as is, the Court’s opinion will result in undue problems for the bar and the South Carolina Workers’ Compensation Commission (“Commission”), and, indeed, the public, by its expansive reading of S.C. Code Ann. § 1-23-380 and its narrow reading of Article 2 of Chapter 67 of the South Carolina Code of Regulations. What this Supreme Court may have viewed as a relatively simple issue will have a profound impact on the authority of the South Carolina Workers’ Compensation Commission.

ARGUMENT

I. RESPECTFULLY, THE COURT OVERLOOKED OR MISAPPREHENDED A NUMBER OF MATERIAL POINTS RESULTING IN UNFAIR PREJUDICE TO THE SCHOOL DISTRICT VIA THE REMAND OF THIS APPEAL TO THE COURT OF APPEALS.

A. The Administrative Procedures Act's section on "Judicial review upon exhaustion of administrative remedies" does not confer on the Appellate Panel the authority to entertain petitions for rehearing.

Respectfully, the Court expanded the breath of S.C. Code Ann. § 1-23-380(1) (Supp. 2015) to confer upon the Appellate Panel the authority to entertain petitions for rehearing. S.C. Code Ann. § 1-23-380(1), titled "Judicial review upon exhaustion of administrative remedies," applies to the *judicial* review upon the *exhaustion* of administrative remedies. "It is 'proper to consider the title or caption of an act in aid of construction to show the intent of the legislature.'" Lindsay v. S. Farm Bureau Cas. Ins. Co., 258 S.C. 272, 277, 188 S.E.2d 374, 376 (1972) (*quoting Univ. of S.C. v. Elliott*, 248 S.C. 218, 221, 149 S.E.2d 433, 434 (1966)). As the title suggests, this section governs the judicial review of upon the exhausting of administrative remedies, and not before the exhaustion of those remedies. This point is reiterated in the plain and ordinary language of the opening sentence of this section: "A party who has exhausted all administrative remedies available within the agency and who is aggrieved by a final decision in a contested case is entitled to judicial review pursuant to this article and Article 1." S.C. Code Ann. § 1-23-380. To read the language of this statute as requiring an agency to rehear matters requires a forced construction.¹

¹ "The cardinal rule of statutory interpretation is to ascertain and effectuate the intention of the legislature." Sloan v. Hardee, 371 S.C. 495, 498, 640 S.E.2d 457, 459 (2000) (*citing Hodges v. Rainey*, 341 S.C. 79, 85, 533 S.E.2d 578, 581 (2000)). "When a statute's terms are clear and unambiguous on their face, there is no room for statutory construction and a court must apply the statute according to its literal meaning." Id. at

The majority's reliance on Lark v. Bi-Lo, Inc., 276 S.C. 130, 132, 276 S.E.2d 304, 305 (1981) is misplaced as noted in the dissent by Justice Pleicones. Rhame, (Pleicones, J., dissenting) (Shearouse Adv. Sh. No. 16 at 28.) The uniformity discussed in Lark is that which "governs the standard of judicial review of awards of the [Commission]"² (i.e., once those decisions are in the court system on judicial review). "Lark therefore established uniformity in the *judicial* review of an agency decision; it did not however establish procedures applicable in the practice before *every* administrative agency." Rhame, (Pleicones, J., dissenting) (Shearouse Adv. Sh. No. 16 at 28). Indeed, the pertinent question examined by the Lark Court was whether the Administrative Procedures Act ("APA") reflected the Legislature's implicit repeal of "the scope of review in Workmen's Compensation cases as set forth in Section 42-17-60." 276 S.C. at 134, 276 S.E.2d at 306. The Lark Court expressly noted that "the principle that repeal of a statute by implication is not favored," but concluded—insofar as the scope of judicial review is concerned—"the legislative intent to repeal the scope of review provisions of Section 42-17-60 is explicitly implied from the provisions of the later general [APA] and [the APA's] legislative history." Id. Accordingly, the Lark Court stopped well short of adopting the particular controlling view of the APA now endorsed by the Court, and the Lark Court also reiterated the paramount importance of determining the intent of the legislature when interpreting its statutes. Id.

498-99, 640 S.E.2d at 459 (*citing* Carolina Power & Light Co. v. City of Bennettsville, 314 S.C. 137, 139, 442 S.E.2d 177, 179 (1994)). "Words must be given their plain and ordinary meaning without resort to subtle or forced construction to limit or expand the statute's operation." Id. at 499, 640 S.E.2d at 459 (*citing* Bryant v. City of Charleston, 295 S.C. 408, 368 S.E.2d 899 (1988); State v. Blackmon, 304 S.C. 270, 273, 403 S.E.2d 660, 662 (1991)).

² 276 S.C. at 135, 276 S.E.2d at 306.

For the Court’s interpretation of S.C. Code Ann. § 1-23-380(1)³ to be accepted, the APA would not only govern the process of appealing an agency’s decision to an appellate court,” but the process for review **within** the agency and, in this instance, it must do so even where the legislature has provided a specific statutory procedure for Commission review in the Workers’ Compensation Act. See S.C. Code Ann. §§ 42-15-50 and -60 (Supp. 2015).⁴

In this regard, the Court’s interpretation violates the general rule of statutory construction in that a specific statute prevails over a more general one, Mims v. Alston, 312 S.C. 311, 440 S.E.2d 357 (1994), as well as the rule that the words of a statute are the best evidence of its meaning. City of Rock Hill v. Harris, 391 S.C. 149, 155, 705 S.E.2d 53, 55 (2011). Title 1 of the South Carolina Code of Laws applies to administrative agencies in general. Section 1-23-380(1) does not provide independent authority for the Commission to rehear a case already decided by the Appellate Panel. It merely describes the procedure for **judicial** review upon the exhaustion of administrative remedies availability within an agency. It does not provide authority for further **administrative** review, i.e., it does not override other acts by the Legislature specifically addressing the

³ In pertinent part, § 1-23-380(1) provides that “[p]roceedings for [judicial] review [upon exhaustion of administrative remedies available within an agency] are instituted by serving and filing notice of appeal as provided in the South Carolina Appellate Court Rules within thirty days after the final decision of the agency or, **if a rehearing is requested**, within thirty days after the decision is rendered.” (emphasis added).

⁴ The Appellate Panel review itself is a rehearing. See S.C. Code Ann. § 42-17-50 (Supp. 2015). Section 42-17-50, titled “Review and rehearing by the Commission,” provides that a party may apply for “commission review” within 14 days of notice of the award. At that point, the Commission will “**review** the award,” “**reconsider** the evidence,” “**rehear** the parties,” and “if proper, amend the award.” (emphasis added). Section 42-17-50 therefore provides for rehearing via Appellate Panel review. After that, an aggrieved party may opt for judicial review under S.C. Code Ann. § 42-17-60 (Supp. 2015).

availability of administrative remedies **within** any agency—which remedy under § 42-17-50 is expressly deemed “conclusive” by § 42-17-60. The Court’s reliance on the APA to support the petition for rehearing by the Commission after the Appellant Panel’s decision is improper because § 1-23-380(1) does not provide any agency authority to rehear a matter—and, in any event, does not provide the Commission such authority in the face of §§ 42-17-50 and -60. It merely advises how to institute proceedings for judicial review from administrative agencies that do not allow rehearings and for those that do allow rehearings.⁵ Under the Workers’ Compensation Act, the Appellate Panel hearing is the rehearing allowed in proceedings before the Commission—as set forth in § 42-17-50—and it is “conclusive,”⁶ and its conclusive nature is not upset or otherwise altered by § 1-23-380(1).

The Court also may have failed to account for how § 1-23-380(1) can be read in consonance with agency-specific statutes and regulations setting forth individualized procedures in the practice of rehearings before different agencies. See S.C. Code Ann. § 58-27-2150 (Supp. 2015) (granting the Public Service Commission the authority to rehear its decisions); S.C. Code Ann. Reg. 28-24 (Supp. 2015) (conferring the same authority on the Department of Consumer Affairs); S.C. Code Ann. Reg. 61-72.806 (Supp. 2015) (conferring the same authority on the Department of Health and Environmental Control). To read § 1-23-380(1) as providing the authority for an administrative agency to rehear a

⁵ Section 1-23-380, titled “Judicial review **upon exhaustion** of administrative remedies,” plainly states that “[a] party **who has exhausted all administrative remedies available within the agency** and who is aggrieved by a final decision in a contested case is entitled to judicial review pursuant to this article and Article 1.” (emphasis added). Nowhere does this statute state how the contested cases should be handled when it is before the agency, that is, before the administrative remedies are exhausted.

⁶ § 42-17-60.

matter would render these agency-specific statutes and regulations as surplusage. See CFRE, LLC v. Greenville Cnty. Assessor, 395 S.C. 67, 74, 716 S.E.2d 877, 881 (2011) (declining to interpret a statute in a manner that renders a surplusage of any word, clause, sentence, provision or part because the Legislature “obviously intended [the statute] to have some efficacy, or the [L]egislature would not have enacted it into law”) (*quoting State v. Sweat*, 379 S.C. 367, 382, 665 S.E.2d 645, 654 (Ct. App. 2008)). In contrast to these agency-specific statutes and regulations, there is no statute or regulation granting the Commission the authority to entertain petitions for hearing after the Appellate Panel has reviewed the matter. In fact, S.C. Code Ann. Reg. 67-215 specifically notes that the “Commission will not address a motion involving the merits of the claim.”⁷

As such, the Commission did not have the authority for a second rehearing of the Commission’s decision when the Claimant filed his petition for rehearing. See Med. Soc’y of S.C. v. Med. Univ. of S.C., 334 S.C. 270, 275, 513 S.E.2d 352, 355 (1999) (“An agency created by statute only has the authority granted it by the [L]egislature.”). Thus, the Claimant’s appeal to the Court of Appeals was untimely and properly dismissed.

B. Article 2 of Chapter 67 of the South Carolina Code of Regulations addresses general aspects of the Regulations, and not solely those of processing a claim up to the hearing before the single commissioner.

i. Article 2 in general

Article 2 of Chapter 67 of the South Carolina Code of Regulations is titled

⁷ Respectfully, the Court overlooked or misapprehended that Regulation 67-215 applies to all motions before the Commission, which is discussed in more detail infra.

“General.”⁸ This article addresses general matters before the Commission and not solely those of processing a claim up to the hearing before the single commissioner. Respectfully, the Court overlooked or misapprehended numerous regulations when it concluded that this article addressed the processing of claims up to the hearing before a single commissioner and refused to apply the regulations therein to be interpreted after a claim was heard by the single commissioner. “Regulations authorized by the legislature have the force of law.” Goodman v. City of Columbia, 318 S.C. 488, 490, 457 S.E.2d 531, 532 (1995) (citing Faile v. S.C. Employment Security Commission, 267 S.C. 536, 230 S.E.2d 219 (1976)). The Court’s interpretation of these regulations overlooked or misapprehended the plain and ordinary meaning of the words and forces a construction to limit their application. See Sloan, 371 S.C. at 498-99, 640 S.E.2d at 459.

S.C. Code Ann. Reg. 67-201(A) (Supp. 2015) notes that “[t]hese regulations are entitled to a liberal construction in furtherance of the purpose for which the South Carolina Workers’ Compensation Law is intended.” Clearly this regulation could not be construed to only call for the liberal construction in matters before they are heard by the single commissioner but not after this hearing takes place. Similarly, S.C. Code Ann. Reg. 67-202 (Supp. 2015) defines words and phrases which are used throughout Chapter 67 of the South Carolina Code of Regulations. To hold Regulation 67-202 only applies to claims up the hearing before the single commissioner would leave terms such as “claimant,” “Judicial Department,” “South Carolina Workers’ Compensation Commission,” and “Workers’ Compensation Law” as undefined in later sections, such as Article 7, which addresses the review and hearing of a single commissioner’s decision

⁸ “It is ‘proper to consider the title or caption of an act in aid of construction to show the

and specifically contains these previously defined terms. See, e.g., S.C. Code Ann. Reg. 67-701—712 (Supp. 2015).

S.C. Code Ann. Reg. 67-203(B) (Supp. 2015) lists the forms which the Commission supplies, including those forms related to a request for review by the Appellate Panel, i.e., Form 30, Request for Commission Review; Form 31, Notice of Review Hearing; and Form 32, Request to Waive Appeal Filing Fee. S.C. Code Ann. Reg. 67-203(B) also lists forms which have nothing to do with contested cases and merely provide for the uniform processing of information by the Commission, i.e., Form 6, Application to Create a Self-Insurance Fund; Form 7A, Corporate Guaranty; Form 12A, Employer’s First Report of Injury; Form 15, Temporary Compensation Report; Form 19, Status Report and Compensation Receipt; Form 39, Coverage Coding Form; Form 61, Attorney Fee Petition; and Form 65, Waiver of Claim Involving an Occupational Disease. Regulation 67-203 cannot reasonably be read to apply only to processing of a claim up to the hearing before a single commissioner when it specifically incorporates forms which are used after this hearing.

S.C. Code Ann. Regs. 67-204 and -205 (Supp. 2015) govern the completion and filing of the Commission’s forms and documents with the Commission, whether the matter is before a single commissioner, the Appellate Panel, or simply before the Commission. S.C. Code Ann. Reg. 67-205(D) (Supp. 2015) specifically addresses forms which are filed in the processing of a claim up to the hearing before the single commissioner, such as Forms 50, 51, 52, 53, 54, 55, and 58, **and** documents which are filed after the matter has been heard by the single commissioner, such as the “Form 30”

intent of the legislature.” Lindsay, 258 S.C. at 277, 188 S.E.2d at 376.

(Request for Commission Review) and “appellate briefs.” To interpret Regulation 67-205 as only applying to claims before the hearing by the single commissioner would render the directives about when a Form 30 (Request for Commission Review) or appellate brief is filed moot as these documents are only filed after the matter has been heard by the single commissioner.

S.C. Code Ann. Regs. 67-209, -210 and -211 (Supp. 2015) govern the computation of time, parties to be served, and how service is effected. These regulations apply equally to a request for a hearing by a single commissioner as they do to the request for a review by the Appellate Panel. S.C. Code Ann. Reg. 67-213 (Supp. 2015) governs the service of orders, hearing notices, and review hearing notices. S.C. Code Ann. Reg. 67-213(B) specifically contemplates the service of hearing notices, which are before the single commissioner, and the service of Form 31, Review Hearing Notices, which are before the Appellate Panel. To interpret Regulation 67-213 as to only apply to claims before the single commissioner has heard the matter would render the directive as to how the Commission must serve notice for the Appellate Panel review hearings moot since these notices are issued only when a single commissioner’s decision is being reviewed.

S.C. Code Ann. Reg. 67-214 (Supp. 2015) governs the issuance of subpoenas. Subpoenas may be issued after the hearing by the single commissioner, and if applicable, the additional and newly discovered evidence may be considered by the Commission.

S.C. Code Ann. Reg. 67-216 (Supp. 2015) governs the appointment of a Guardian ad Litem, both before and after a hearing by the single commissioner. To read this regulation as only applying to a claim before it is heard by the single commissioner

would result in no regulation for the appointment of a Guardian ad Litem should one be required after the hearing by the single commissioner.

S.C. Code Ann. Regs. 67-207 and -208 (Supp. 2015) govern the request for a hearing before a single commissioner, whether by the claimant or the employer. These two general regulations are obviously related to processing a claim before the single commissioner hears the matter.⁹ These are the only two regulations in the “General” section which relate solely to the processing of claims up to the hearing by the single commissioner. Contrary to the Court’s interpretation, an unforced reading of the plain and ordinary language of the regulation in Article 2 evidences that Article 2 was drafted to apply to all matters before the Commission.

ii. Regulation 67-215

S.C. Code Ann. Reg. 67-215 (Supp. 2015) governs all motions practice before the Commission and not solely those matters of processing a claim up to the hearing before the single commissioner. Regulation 67-215(A) lists the various motions which the Commission will accept, including motions related to the appointment of a Guardian ad Litem, an attorney’s appearance or withdrawal, self-insurance privileges, and penalties and/or interest. These are matters which the Commission may address at any time in the claim’s process. Similarly, there is nothing in the plain and ordinary language of the regulation to limit these matters from being addressed by the Commission at any stage of the processing of a claim.

To read Regulation 67-215(B), which states that “[t]he Commission will not

⁹ Article 6 of Chapter 67 of the South Carolina Code of Regulations is titled “Contested Case Procedure.” These regulations clearly are related to processing a claim before the single commissioner.

address a motion involving the merits of the claim, including, but not limited to, a motion (1) [f]or dismissal; or (2) [f]or summary judgment”, as narrowly as the Court has interpreted Regulation 67-215 and all of Article 2 would mean that the Commission could not appoint a Guardian ad Litem or note the appearance or withdrawal of an attorney unless the matter has not yet been heard by the Single Commission. This narrow interpretation of Regulation 67-215, in conjunction with the rest of the Court’s decision in this matter, results in the Court finding that the Commission now has the authority to address motions on the merits, as long as they are petitions for rehearing. Not only does this narrow interpretation effect this appeal, but this interpretation now deprives the Commission of the authority to appoint a Guardian ad Litem or note the removal of an attorney after a contested case is no longer with the single commissioner.

One foreseeable problem is that an attorney may no longer withdraw as counsel after the hearing before the single commissioner. As such, an attorney may be required to represent a client (whether a claimant or an employer) in a frivolous Appellate Panel review because she is unable to withdraw her representation. Similarly, if a claimant becomes mentally incompetent after the hearing by the single commissioner, there is now no procedure for a Guardian ad Litem to protect a claimant who has become mentally incompetent after the hearing by the single commissioner but before the claim is closed. Surely the Court did not mean for such a consequence, but nonetheless, these are but two results of such a narrow reading on Regulation 67-215.

Under an unforced reading of the regulations, the Commission did not have the authority for a second rehearing of the Commission’s decision when the Claimant filed his petition for rehearing. See Med. Soc’y of S.C., 334 S.C. at 275, 513 S.E.2d at 355.

Thus, the Claimant's appeal to the Court of Appeals was untimely and properly dismissed.

C. **Article 7 and Regulation 67-712 does not provide the Commission with the authority to entertain petitions for rehearing.**

Respectfully, the Court overlooked or misapprehended S.C. Code Ann. Reg. 67-712 (Supp. 2015) when it held that the regulation "authorizes 'higher court review' and expressly incorporates 'Rule 203(b)(6), SCACR.'" First, there is no regulation in Article 7, "Review and Hearing," of Chapter 67 of the South Carolina Code of Regulations disallowing merits-based motions to the Appellate Panel because merits based motions are disallowed under Article 2, "General."¹⁰ As such, the prohibition on merits based motions applies to matters both before and after the claim has been heard by the single commissioner. Stated differently, the prohibition on merits based motions, Regulation 67-215, is a general prohibition and is thus included in the "General" section of the regulations—Article 2. If the prohibition was only to apply to matters before the single commissioner's hearing, it would have been included in the "Contested Case Procedure" section—Article 6.

Second, S.C. Code Ann. Reg. 67-712(A) states, "Notice shall be given to the Judicial Department of any and all subsequent appeals and orders. **See** Rule 203(b)(6), SCACR." (Bold and underlined emphasis added.) To read a reference to Rule 203(b)(6), SCACR, in Regulation 67-712 as authorizing higher court review forces the construction of this plain language which merely advises when and to whom notice of subsequent

¹⁰ "It is 'proper to consider the title or caption of an act in aid of construction to show the intent of the legislature.'" Lindsay, 258 S.C. at 277, 188 S.E.2d at 376.

appeals, i.e., those appeals after the Appellate Panel review, should be given by referencing the requirements set forth in the South Carolina Appellate Court Rules.

Regulation 67-712 contains the only reference to the South Carolina Appellate Court Rules contained in Chapter 67 of the South Carolina Code of Regulations. As such, the references to the South Carolina Rules of Civil Procedure in Chapter 67 of the South Carolina Code of Regulations are instructive. The South Carolina Rules of Civil Procedure are referenced in four regulations in Chapter 67. Each time the South Carolina Rules of Civil Procedure is referenced in Chapter 67, it is specifically incorporated unlike S.C. Code Ann. Reg. 67-712(A) which merely provides, “**See Rule 203(b)(6), SCACR.” (Bold and underlined emphasis added.) For example, S.C. Code Ann. Regs. 67-211, -214, and -215 (Supp. 2015) provide that when a form or mailing is returned, “service may be completed pursuant to the South Carolina Rules of Civil Procedure.” S.C. Code Ann. Regs. 67-211(A)(1), 67-211(B)(1), 67-211(B)(2), 67-211(C)(1), 67-214(D), 67-14(E), 67-215(E)(2). S.C. Code Ann. Reg. 67-216(D) (Supp. 2015) also provides that “[t]he qualifications of and proceedings for appointment of a Guardian ad Litem shall be the same as those found in the South Carolina Rules of Civil Procedure; but, a Commissioner may require the appointment of an attorney as the Guardian ad Litem.”**

Unlike the references to the South Carolina Rules of Civil Procedure in Regulations 67-211, -214, -215, and -216, the reference to the South Carolina Appellate Court Rules is preceded by a signal, “See,” to indicate that one should look to Rule 203(b)(6), SCACR when preparing an appeal. Like S.C. Code Ann. § 1-23-380(1), which addresses the judicial review after the exhaustion of administrative remedies, Rule 203(b)(6), SCACR, does not authorize the Commission to hear petitions for rehearing but

merely advises when the notice of appeal to the Court of Appeals should be served and to whom notice should be given.

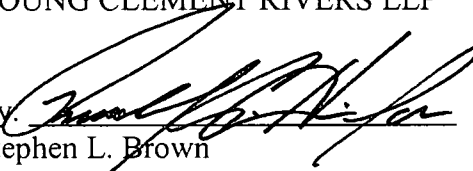
Under an unforced reading of the regulations, the Commission did not have the authority for a second rehearing of the Commission's decision when the Claimant filed his petition for rehearing. See Med. Soc'y of S.C., 334 S.C. at 275, 513 S.E.2d at 355. Thus, the Claimant's appeal to the Court of Appeals was untimely and properly dismissed.

CONCLUSION

For the foregoing reasons, and for the reasons set forth in the School District's previously-filed briefs (which the School District incorporates herein by reference), the School District asks this Court to rehear and reconsider its decision, and to affirm the Court of Appeals' dismissal of this appeal.

Respectfully submitted,

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Dated: 5/6/15

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

Appeal from the South Carolina Workers' Compensation Commission

Opinion No. 27516 (S.C. Sup. Ct. filed April 22, 2015)

Ricky Rhame,

Petitioner,

v.

Charleston County School District,

Respondent,

PROOF OF SERVICE

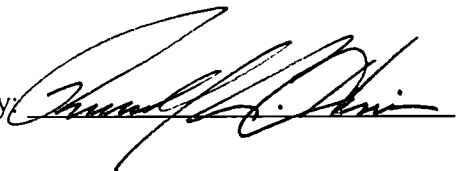
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Attorneys for the Respondent
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I, Russell G. Hines, of Young Clement Rivers, LLP, do hereby certify that a copy of the Respondent's **Petition for Rehearing** in the above-captioned matter was served on the Petitioner by depositing a copy of the same in the United States Mail, postage prepaid, on May 6, 2015, addressed as follows to his attorneys of record:

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John S. Nichols, Esquire
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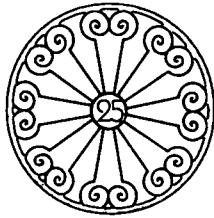
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YOUNG CLEMENT RIVERS, LLP

By: 

Charleston, South Carolina

Dated: 5/6/15



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May 6, 2015

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MAY - 7 2015

VIA FED-EX DELIVERY

Honorable Daniel E. Shearouse, Clerk
South Carolina Supreme Court
P. O. Box 11330
Columbia, SC 29211-1330

S.C. Supreme Court

Re: Ricky Rhame v. Charleston County School District
Appellate Case No.: 2012-213148
Date of Loss: 5/4/2009
YCR File: 6959-20091166

Dear Mr. Shearouse:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of a Petition for Rehearing. Also enclosed are the original and two (2) copies of a proof of service regarding the same and a firm check in the amount of \$25.00 covering the costs associated with this request. Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

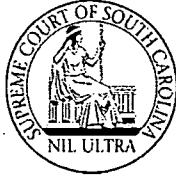
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Enclosures

cc: (All below via E-Mail and US Mail)
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John S. Nichols, Esquire, Bluestein Nichols Thompson Delgado, LLC
Ken W. Harrell, Esquire, Joye Law Firm, L.L.P.



The Supreme Court of South Carolina

Young Clement Rivers

05/07/2015

RECEIPT #75910

Case No: 2012-213148
Case Short Title: Ricky Rhame v. Charleston County School
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 157352
Check/Money Order Date: 05/06/2015
Comments: