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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

W.C.C. File No · 1204039

William Lee Turner, Employee,Appellant,

v.

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

**MOTION FOR CORRECTION AND/OR AMENDMENT
OF RECORD ON APPEAL**

Pursuant to Rule 210, SCACR, Respondents move this Court to order that the following corrections be made to the Record on Appeal ("ROA").

1 The first full page of the text of the Full Commission Decision and Order, filed October 10, 2014 is missing.

2 Pages are missing from the transcript of the hearing before the Hearing Commissioner held February 4, 2014. Both Appellant and Respondents designated the full transcript of this hearing. For example, pages 46 and 56 of that transcript are missing. Respondents cite both pages 46 and 56 of this transcript in their Brief.


3. The transcript of the deposition of Paul Barnette, taken August 20, 2012, is missing page 5. Both Appellant and Respondents designated the full transcript of this deposition. Respondents cite page 5 of this transcript in their Brief

Respondents request this Court to order Appellant to correct and/or amend the ROA as outlined above. Respondents further request this Court to order that the Final Briefs in this appeal will not be due until the Record on Appeal has been properly corrected and/or amended

This motion conforms with Rule 240, SCACR.

Respectfully submitted,
MCANGUS GOUDELOCK & COURIE

April 29, 2015



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Construction and Old Republic General
Insurance Corporation c/o Gallagher
Bassett Services, Inc*

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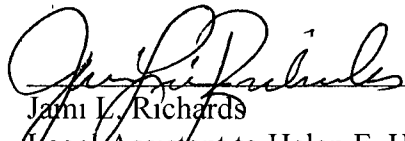
v.

SAIIA Construction, Employer, and
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c/o Gallagher Bassett Services, Inc , Carrier, Respondents.

PROOF OF SERVICE

I certify that on the 29th day of April 2015, I served the Respondents' **Motion for Correction and/or Amendment of Record on Appeal** on William Lee Turner by depositing a copy of it in the United States Mail, postage prepaid, addressed to his attorney of record

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Reply To

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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 please find the original and seven (7) copies of Respondents' Motion for Correction and/or Amendment of Record on Appeal, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the self-addressed, stamped envelope. Also enclosed is our firm's check in the amount of \$25 for filing the motion.

If you have any questions, please do not hesitate to contact me.

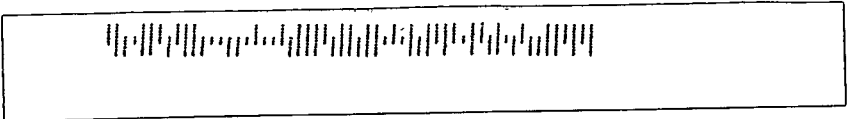
Yours truly,

McAngus Goudelock & Courie, LLC


Helen F. Hiser

Enclosures

cc: Preston F. McDaniel, Esq.



mgc

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