

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

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APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

Full Commission Appellate Panel Order

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WCC File No.: 1222136

Appellate Case No.: 2015 - 001277

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Otis Nero, (Claimant),.....Appellant,

v.

South Carolina Department of Transportation (Employer), and  
State Accident Fund (Carrier),.....Respondents.

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

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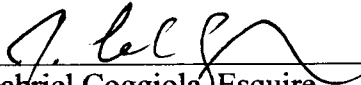
In addition to the materials designated by Appellant, Respondents propose that the following materials be included in the record on appeal for this case:

1. Defendants' Trial Exhibit K.

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

Respectfully Submitted,

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

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

August 17, 2015

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**CERTIFICATION OF COUNSEL**

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Pursuant to Rule 209(c), SCACR, I certify that Respondents' Designation of Matter to be Included in the Record on Appeal dated August 17, 2015 contains no matter which is irrelevant to this appeal.

Respectfully Submitted,

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

  
\_\_\_\_\_  
J. Gabriel Coggiola, Esquire  
Willson, Jones, Carter & Baxley, P.A.  
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Attorney for Respondents

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AUG 17 2015

SC Court of Appeals

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Otis Nero, (Employee/Claimant),..... Appellant,

v.

South Carolina Department of Transportation (Employer), and  
State Accident Fund (Carrier),..... Respondents.

**PROOF OF SERVICE**

I certify that I, Leigh Ball, legal assistant to J. Gabriel Coggiola, have properly served **Respondents' Initial Brief and Designation Of Matter To Be Included In The Record**, by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses on August 17, 2015

Stephen J. Wukela  
Wukela Law Firm  
P.O. Box 13057  
Flornece, South Carolina 29504  
Attorney for Appellant

**(Hand Delivery)**

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

B. Leigh Ball

B. Leigh Ball, Legal Assistant  
Willson, Jones, Carter & Baxley  
4500 Fort Jackson Blvd.  
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(803) 782-2519  
bball@wjlaw.net

August 17, 2015  
Columbia, South Carolina

WILLSON JONES CARTER & BAXLEY, P.A.

ATTORNEYS AT LAW

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August 17, 2015

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SC Court of Appeals

**Hand Delivery**

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

Re: Otis Nero vs. SC Department of Transportation  
WCC File No.: 1222136 DOI: 6/20/2012  
**Appellate Case No.: 2015-001277**

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 attorney for the Appellant.

With kindest regards,

**Willson Jones Carter & Baxley, P.A.**



John Gabriel Coggiola

JGC/jgc  
Enclosure  
cc: Stephen Wukela, Esquire  
Robin Oxner-King, Adjuster (via email)