

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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W.C.C. File No.: 0824526

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**RECEIVED**

JAN 06 2016

SC Court of Appeals  
Appellant,

Robert L. Harrison, Employee, ..... Appellant,

v.

Owen Steel Company, Inc., Employer, and  
Old Republic Insurance Company  
c/o Gallagher Bassett Services, Inc., Carrier, ..... Respondents.

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

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Respondents propose the following be included in the Record on Appeal:

1. Single Commissioner Decision & Order, filed November 7, 2013;
2. Appellate Panel Decision & Order, filed May 12, 2014;
3. Decision & Order of Single Commissioner, filed February 12, 2015;
4. Appellate Panel Decision & Order, filed September 8, 2015;
5. Form 50, dated April 24, 2013;
6. Form 50, dated April 29, 2013;
7. Form 50 dated May 8, 2013, with Addendum;
8. Respondents' Form 51, dated May 24, 2013;
9. Claimant's Form 58, filed under cover of letter dated June 24, 2013;

10. Claimant's 2013 APAs, dated June 24, 2013, pp. 2-7, 9-15, 18-20, 29-32;
11. Respondents' Form 58, filed June 27, 2013;
12. Respondents' 2013 APA, dated June 27, 2013, pp. 41, 46, 65-68;
13. Claimant's Form 58 Pre-Hearing Brief, dated July 17, 2014;
14. Claimant's 2014 APA, dated July 17, 2014, p. 2;
15. Respondents' Form 58 Pre-Hearing Brief, dated July 22, 2014;
16. Respondents' 2014 APA, dated July 22, 2014, pp. 50-57, 63-77;
17. Claimant's 2013 APA in W.C.C. File No. 1013900, dated June 24, 2013, p. 9;
18. Claimant's Form 30, dated November 21, 2013;
19. Form 30, dated February 20, 2015;
20. Form 19 in W.C.C. File No. 1013900, dated August 17, 2011 and filed under cover of letter dated September 7, 2011;
21. Form 16A in W.C.C. File No. 1013900, filed under cover of letter dated September 7, 2011;
22. Transcript of August 8, 2013 hearing before the Single Commissioner, pp. 24-26, 28-30, 32, 33-40, 42, 45-47 ;
23. Transcript of February 18, 2014 hearing before the Appellate Panel of the Full Commission, pp. 6, 7, 12, 13, 15;
24. Transcript of August 1, 2014 hearing before the Single Commissioner;
25. Letter from G. Line to J. Mullis, Jr., dated December 13, 2011; and
26. Letter from J. Mullis, Jr. to SC Workers' Compensation Commission, dated December 30, 2011.

I certify that this designation contains no matter that is irrelevant to this appeal.

Respectfully submitted,  
McANGUS GOUDELICK & COURIE, LLC



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(843) 576-2900

January 5, 2016

*Attorneys for Respondents*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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WORKERS' COMPENSATION COMMISSION

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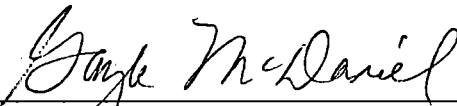
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**PROOF OF SERVICE**

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I certify that on the 5<sup>th</sup> day of January 2016, I served the **Respondents' Initial Brief** and **Respondents' Designation of Matter to be Included in the Record on Appeal** on Robert L. Harrison by depositing a copy of it in the United States Mail, postage prepaid, addressed to his attorney of record:

Frank A. Barton, Esq.  
Attorney at Law, P.A.  
P.O. Box 3972  
West Columbia, SC 29169

  
\_\_\_\_\_  
Gayle McDaniel  
Legal Assistant to Helen F. Hiser  
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(843) 576-2900

*Attorneys for Respondents*



**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

January 5, 2016

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JAN 06 2016  
SC Court of Appeals

**Via U.S. Mail**

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

RE: Robert L. Harrison v. Owen Steel Co., Inc. and Old Republic Insurance  
Company c/o Gallagher Bassett Services, Inc.  
Date of Accident: September 17, 2008  
WCC File No.: 0824526  
Our File No.: 2098.12057  
Claim No.: 002979-007796-WC-01  
Appeal No.: 2015-002093

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

1. original and one copy of the Respondents' Initial Brief;
2. original and one copy of Respondents' Designation of Matter to be Included in the Record on Appeal; and
3. original and one copy of Respondents' Proof of Service concerning items one and two.

Please file these documents and return the clocked-in copies in the enclosed, self-addressed stamped envelope.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: Frank A. Barton, Esq.

**mgc** | **INSURANCE  
DEFENSE**

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**2098.12057/JWL/gcm**  
The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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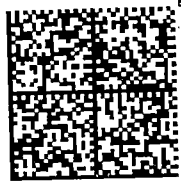
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The Honorable Jenny Abbot Kitchings  
South Carolina Court of Appeals  
PO Box 11629  
Columbia SC 29211-1629

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SC Court of Appeals

