

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

**RECEIVED**

APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION APPELLATE PANEL

---

MAR 01 2016  
SC Court of Appeals

Appellate Case No. 2015-002120  
SCWCC Case No. 0802605

---

Tommy G. Houston, ..... Respondent,

vs.

Garda World Security, Employer, and  
Gallagher Bassett Services, Inc., Carrier, ..... Appellants.

---

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

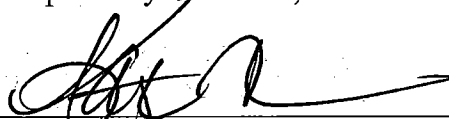
---

Houston asserts that the materials included in Garda's proposed Record on Appeal before the Court of Appeals appears complete and relies upon those submitted materials.

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

[Signature Page Follows]

Respectfully submitted,



Kathryn Williams (SC Bar #6140)

Kathryn Williams, P.A.

619 North Main St.

P.O. Box 10693

Greenville, S.C. 29603

(864) 235-6254

Attorney for Respondent

Dated:



Greenville, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION APPELLATE PANEL

**RECEIVED**  
MAR 01 2016  
SC Court of Appeals

Appellate Case No. 2015-002120  
SCWCC Case No. 0802605

Tommy G. Houston, ..... Respondent,

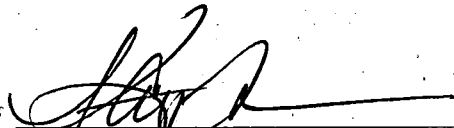
vs.

Garda World Security, Employer, and  
Gallagher Bassett Services, Inc., Carrier, ..... Appellants.

**CERTIFICATE OF SERVICE**

This is to certify that the undersigned did cause the **RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** to be served upon the following parties by mailing a copy of same to the addresses shown below by United States Mail, proper postage prepaid, on the 25 day of February, 2016.

R. Daniel Addison  
Lee E. Dixon  
Hedrick Gardner Kincheloe & Garofalo  
P.O. Box 11267  
Columbia, SC 29211



Kathryn Williams (SC Bar #6140)  
Kathryn Williams, P.A.  
619 North Main St.  
P.O. Box 10693  
Greenville, S.C. 29603  
(864) 235-6254  
Attorney for Respondent

**KATHRYN WILLIAMS, P.A.**

ATTORNEYS AT LAW  
POST OFFICE BOX 10693  
GREENVILLE, SC 29603

KATHRYN WILLIAMS  
DONALD E. KAMB, JR.  
ANDREW N. PRICE  
TOM J. ERVIN  
OF COUNSEL

619 N. MAIN STREET  
GREENVILLE, SC 29601  
TELEPHONE (864) 235-6254  
FAX (864) 233-6591

February 25, 2016

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

**RECEIVED**  
MAR 01 2016  
SC Court of Appeals

Re: **Tommy G. Houston vs. Garda World Security, et al.**  
WCC File No.: 0802605  
Case Tracking No.: 2015-002120

Dear Ms. Kitchings:

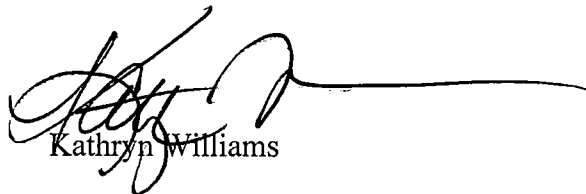
Enclosed herein please find the following items for filing in the above-referenced matter:

1. Initial Brief of Respondent;
2. Designation of Matter to be Included in the Record on Appeal; and
3. Certificate of Service by Mail.

By copy of this letter, I am also serving appellants' attorney with copies of the same.

Kindest regards,

Yours truly,

  
Kathryn Williams

KW/anp  
Enclosure

cc: R. Daniel Addison  
Lee E. Dixon  
Hedrick Gardner Kincheloe & Garofalo  
P.O. Box 11267  
Columbia, SC 29211

neopost<sup>®</sup>  
02/25/2016  
**US POSTAGE**

FIRST-CLASS MAIL

**\$02.30<sup>00</sup>**



ZIP 29601  
041L10205799

**KATHRYN WILLIAMS, P.A.**

ATTORNEYS AT LAW  
POST OFFICE BOX 10693  
GREENVILLE, SC 29603

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

**RECEIVED**

MAR 01 2016