

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2014-001788

Clarence Winfrey, Employee, Claimant, Respondent,

v.

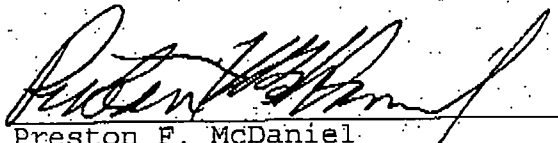
Archway Services, Inc., Employer,
and American Fire & Casualty Insurance
Company c/o Liberty Mutual Group, Carrier, Appellants.

PROOF OF SERVICE

I certify that I have served the MOTION TO COMPEL MEDICAL CARE with MEMORANDUM IN SUPPORT, and AFFIDAVIT OF PRESTON F. MCDANIEL by depositing a copy of it in the United States Mail, postage prepaid, on March 4, 2016 addressed to:

Brett H. Bayne, Esquire
McAngus, Goudelock & Courie
Post Office Box 12519
Columbia, SC 29211.

Dated: March 4, 2016


Preston F. McDaniel
MCDANIEL LAW FIRM
1315 Elmwood Avenue
Columbia, South Carolina 29201
(803) 771-7211

Attorney for Respondent

McDANIEL LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW
1315 ELMWOOD AVENUE
COLUMBIA, SOUTH CAROLINA 29201

Proudly representing injured workers
for over 30 years.

Preston F. McDaniel

Matthew Robertson

Telephone (803) 771-7211

Facsimile (803) 252-0709

March 4, 2016

AND VIA FACSIMILE - 734-1839

AND US MAIL

Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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MAR 07 2016

SC Court of Appeals

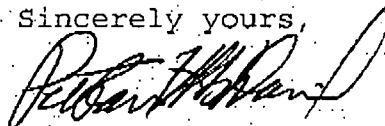
RE: Clarence Winfrey, Employee, Respondent, v. Archway
Services, Inc., Employer, and American Fire &
Casualty Insurance Co., Carrier, Appellants.
Appellate Case No. 2014-001788

Dear Ms. Kitchings:

Please find attached a Motion to Compel Medical Care pursuant to the Award of the Workers Compensation Commission and the provisions of SC Code §42-17-60. The Defendants, while authorizing medical care through MUSC, have now abruptly refused to provide and authorize the surgery recommended by MUSC and a dental exam that is necessary to clear Mr. Winfrey for that surgery. According to my understanding, my client's condition is deteriorating and this care needs to be accomplished as soon as possible. For those reasons, I would specifically request a hearing as soon as is possible after the ten (10) days date for response runs pursuant to Rule 240(j). Pursuant to Rule 262, we are filing and serving this by mail and also pursuant to Rule 262(2), sending and filing a facsimile copy with the Court to expedite a hearing in this matter. Although not required, we are also emailing a copy of this document to Defense Counsel. The required \$25.00 filing fee and the appropriate Affidavits of Service are also enclosed.

I look forward to the hearing in this matter.

Sincerely yours,



Preston F. McDaniel

PFM/kth/abh
Enclosures

cc: Brett H. Bayne, Esquire (via email brett.bayne@mgclaw.com and US Mail)

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FAX TRANSMISSION COVER SHEET

Date: March 4, 2016
From: McDaniel Law Firm
To: Jeremy Abbott Kitchings
Fax Number Called: 734-1839
Regarding: Case: 2014-2014-001788
Comments:

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SC Court of Appeals

Please see attached.

Thank you.

We are transmitting _____ pages, including face sheet.

If you have any problems with this transmission, please call me
at 803-771-7211.

Transmitted from Fax Number 803-252-0709

Transmitted by: Andrea Nam

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