

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2014-001788

RECEIVED

APR 07 2016

SC Court of Appeals

Clarence Winfrey, Employee, Claimant, ..... Respondent,

v.

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

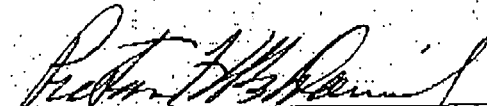
MOTION FOR A RULE TO SHOW CAUSE  
AND FOR CONTEMPT FOR FAILURE TO PROVIDE  
MEDICAL CARE PURSUANT TO THE ORDER OF  
THE COURT FILED MARCH 18, 2016  
COMPELLING MEDICAL CARE PURSUANT  
TO THE AWARD OF THE  
SC WORKERS' COMPENSATION COMMISSION  
UNDER SC CODE §42-17-60

TO: MR. BRETT BAYNE, COUNSEL FOR THE APPELLANTS:

YOU WILL PLEASE TAKE NOTICE that on the tenth (10th)  
day after service hereof or as is allowed by the Court  
Rules, SCACR, Rule 240(e) after such shorter time to  
respond as is designated by the Court which is requested  
hereinafter, the Respondent hereby moves for a Rule to Show  
Cause as to why the Appellants should not be held in

contempt and for such other and further relief as is appropriate under applicable statutes and Rules of the Court. Pursuant to Rule 240(e), SCACR, since the Movant/Respondent is seeking enforcement of the Order of the Court, the Movant would request that the Court, "in its discretion . . . limit the time for filing the Return," and direct a shorter time for the Return to this Motion For A Rule To Show Cause and enforcement of the Court to be filed. Said Motion is based upon the Memorandum attached hereto and incorporated herein by reference.

I SO MOVE.



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

Attorney for Respondent/Movant

April 6, 2016

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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Appellate Case No. 2014-001788

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v.

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

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PROOF OF SERVICE

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I certify that I have served the MOTION FOR A RULE TO SHOW CAUSE AND FOR CONTEMPT FOR FAILURE TO PROVIDE MEDICAL CARE PURSUANT TO THE ORDER OF THE COURT FILED MARCH 18, 2016 COMPELLING MEDICAL CARE PURSUANT TO THE AWARD OF THE SC WORKERS' COMPENSATION COMMISSION UNDER SC CODE §42-17-60, MEMORANDUM IN SUPPORT and PROPOSED RULE TO SHOW CAUSE ORDER by depositing a copy of it in the United States Mail, postage prepaid and also by electronic mail, on April 7, 2016 addressed to:

brett.bayne@mgclaw.com  
Brett H. Bayne, Esquire  
McAngus, Goudelock & Courie  
Post Office Box 12519  
Columbia, SC 29211.

Dated: April 7, 2016

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

Attorney for Respondent/Movant

McDANIEL LAW FIRM  
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COLUMBIA, SOUTH CAROLINA 29201

Proudly representing injured workers  
for over 30 years.

Preston F. McDaniel

Telephone (803) 771-7211

Matthew Robertson

Facsimile (803) 252-0709

April 7, 2016

VIA FACSIMILE AND US MAIL

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

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:

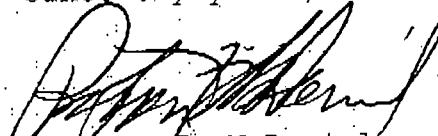
Please find enclosed my Motion for a Rule to Show Cause to the  
Order issued by the Court (Judge Lockemy, Judge Paula Thomas and  
Judge John Geathers) on March 18, 2016 along with the required  
number of copies and required filing fee.

By copy of this letter I am notifying and serving Counsel for  
the Appellants with a copy of this Motion. I am also emailing a  
copy to Mr. Bayne and am faxing a copy to the Court pursuant to  
Rule 262(a)(2), SCACR.

Also enclosed is a draft or proposed Rule to Show Case for the  
Court's consideration

As always, I appreciate all the courtesies and kindnesses  
shown to me by the Court.

Sincerely yours,



Preston F. McDaniel

PFM/kth  
Enclosures

cc: Brett H. Bayne, Esquire

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FAX TRANSMISSION COVER SHEET

Date: 4/7/16  
From: Preston F. McDaniel  
To: Hon. Jenny Abbott Kitchings  
Fax Number Called: 734-1839  
Regarding: Appellate Case # 2014-001788  
Comments: \_\_\_\_\_

Please see attached.

We are transmitting 23 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: Jm

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