

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION  
APPELLATE PANEL

**RECEIVED**

JUN 22 2016

**SC Court of Appeals**

Appellate Case No.: 2016-000601

Scott Ledford, Employee.....Appellant,

v.

Department of Public Safety, Employer, and State Accident Fund, Carrier.....Respondents.

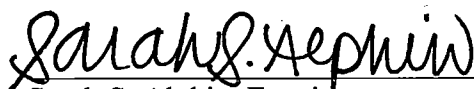
**RESPONDENTS' DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD ON APPEAL**

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. Form 21 Employer's Request for Hearing, January 31, 2014.
2. Defendants' Form 58 and APA Submissions, August 11, 2014.
3. Defendants' Exhibit B, Form 16A, September 11, 2011.
4. Defendants' Exhibit C, ProCutters tax returns for years 2012 and 2013.
5. Defendants' Hearing Exhibit 1, Statement of Dr. Sarb.
6. Deposition Transcript of Dr. Mills, August 23, 2012.

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

Respectfully Submitted,



Sarah S. Alphin, Esquire  
S.C. Bar No.: 78645

John Paul Simkovich, Esquire  
S.C. Bar No.: 101861

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

4500 Fort Jackson Boulevard  
Columbia, South Carolina 29209  
(803) 227-2885

Attorneys for Respondents

June 22, 2016  
Columbia, South Carolina

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**PROOF OF SERVICE**

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I certify that I, Cindy D. Lamb, 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 June 22, 2016:

E. Hood Temple, Esquire  
Hatfield Temple, LLP  
170 Courthouse Square  
Post Office Box 1770  
Florence, SC 29503-1770

J. Kevin Holmes, Esquire  
The Steinberg Law Firm, LLP  
61 Broad Street  
Post Office Box 9  
Charleston, SC 29402

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v.

Department of Public Safety, Employer, and State Accident Fund, Carrier.....Respondents.

**PROOF OF SERVICE**

I certify that I, Sarah S. Alphin, have properly served **Respondents' Initial Brief and Designation Of Matter To Be Included In The Record**, by hand delivery to the following on June 22, 2016:

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

*Sarah S. Alphin*

Sarah S. Alphin, Esquire  
Willson, Jones, Carter & Baxley  
4500 Fort Jackson Blvd.  
Columbia, SC 29209  
(803) 227-2885  
ssalpin@wjlaw.net

June 22, 2016  
Columbia, South Carolina

*Cindy Lamb*

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June 22, 2016  
Columbia, South Carolina

# WILLSON JONES CARTER & BAXLEY, P.A.

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June 22, 2016

**(via hand delivery)**

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

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JUN 22 2016

**SC Court of Appeals**

Re: Scott Ledford vs. Department of Public Safety  
WCC File No.: 1202545  
Appellate Case No. **2016-000601**

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 Respondents' Initial Brief and Respondents' Designation of Matter to be Included in the Record on Appeal on the attorneys for the Appellant by United States Mail with first class postage prepaid.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

*Sarah S. Alphin*

Sarah S. Alphin

Enclosure

cc: Mr. E. Hood Temple, Esquire  
Mr. J. Kevin Holmes, Esquire  
Ms. Meredyth Harden (via email)