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AUG 12 2016

REPLY TO:

David H. Keller

SC Court of Appeals

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August 10, 2016

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

RE: Ignacio Rodriguez v. Robert T. Pierson d/b/a Pierson Construction Co., and ABC Care Inc., and Property and Casualty Co. of Hartford and The South Carolina Uninsured Employers Fund
Appeal from the The South Carolina Workers' Compensation Commission
Case No. 1320141
Appellate Case No. 2016-001497

Dear Ms. Kitchings:

I am in receipt of Mr. Padgett's Amended Notice of Appeal and Amended Memorandum in support of his Motion to Present Additional Evidence. It appears that the Motion and the supporting Memorandum have not changed from what was originally served on Mr. Ehliès as attorney for the Respondent, Ignacio Rodriguez and the Respondent, South Carolina Workers' Compensation Uninsured Employers Fund which I represent. Therefore, Mr. Ehliès and I stand by our original Memorandum filed with the court on July 25, 2016. Should you need anything further from the parties in the matter, please feel free to contact me.

Yours truly,

TURNER PADGETT GRAHAM & LANEY P.A.



David H. Keller

DHK/sbd

cc: David M. Padgett, William H. Ehliès, Randall S. Hiller

Turner Padget

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