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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2014-001788

RECEIVED
AUG 18 2016
SC Court of Appeals

Clarence Winfrey, Employee, Claimant,Respondent/Movant,

v.

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

PETITION FOR REHEARING
AS TO THE ORDER OF THE HONORABLE PAULA H. THOMAS
FILED JULY 29, 2016

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

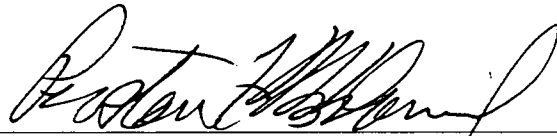
YOU WILL PLEASE TAKE NOTICE that pursuant to South Carolina Appellate Court Rules and in particular, Rule 240(j) which specifically provides that review of an Order issued by an individual Judge or Justice, "shall be by Petition for Rehearing", the Movant hereby petitions for rehearing as to specific points, decision, and rulings made and contained within the Order of the Honorable Paula H. Thomas filed July 29, 2016 as to the Motion filed with the Court captioned: "Per the Order of the SC Supreme

Court, Motion for an Ex Parte Protective Order Cancelling the Deposition set for August 1, 2016 and for a Protective Order after Proper Notice Enforcing the Court's Order of March 18, 2016".

Note: the Order of Judge Thomas on the issues pertaining to discovery; the Court's Order of March 18, 2016; and the Court's statutory responsibility under SC Code §42-17-60 (as Amended after 7/1/07) is a final Ruling by the Court). Said Petition is based upon the Memorandum attached hereto and incorporated herein by reference.

I SO MOVE.

Respectfully submitted,



Preston F. McDaniel, Esquire
SC Bar #: 3770
MCDANIEL LAW FIRM
1315 Elmwood Avenue
Columbia, South Carolina 29201
(803) 771-7211
Attorney for Respondent/Movant

August 15, 2016

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In the Court of Appeals

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WORKERS' COMPENSATION COMMISSION

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Clarence Winfrey, Employee, Respondent/Movant,

v.

Archway Services, Inc., Employer,
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Company c/o Liberty Mutual Group, Carrier, Appellants.

PROOF OF SERVICE

I certify that I have served the **PETITION FOR REHEARING AS TO THE ORDER OF THE HONORABLE PAULA H. THOMAS FILED JULY 29, 2016** with **MEMORANDUM IN SUPPORT** and **AFFIDAVIT OF PRESTON F. MCDANIEL** on August 15, 2016 via US Mail addressed as follows:

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

Dated: August 15, 2016



Preston F. McDaniel
SC Bar No. 3770
MCDANIEL LAW FIRM
1315 Elmwood Avenue
Columbia, South Carolina 29201
(803) 771-7211

Attorney for Respondent/Movant

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

Telephone (803) 771-7211

Matthew Robertson

Facsimile (803) 252-0709

August 15, 2016

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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

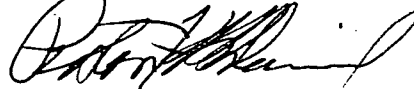
Dear Ms. Kitchings:

Please find enclosed my **PETITION FOR REHEARING AS TO THE ORDER OF THE HONORABLE PAULA H. THOMAS FILED JULY 29, 2016** with **MEMORANDUM IN SUPPORT**, and **AFFIDAVIT OF PRESTON F. MCDANIEL** along with the appropriate 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 Petition for Rehearing and Memorandum in Support of same.

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

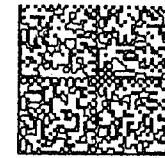
Sincerely yours,



Preston F. McDaniel

PFM/kth
Enclosures

cc: Brett H. Bayne, Esquire



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SC Court of Appeals

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