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SEP 12 2016  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM  
THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Full Commission Decision

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Appellate Case No. 2016-001497

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Ignacio Rodriguez .....Employee, Claimant, Respondent,

v.

Robert T. Pierson d/b/a Robert T. Pierson Constr. Co., Employer, and  
ABC Care, Inc., Employer, Respondents,

and

South Carolina Uninsured Employers' Fund, Property & Casualty  
Insurance Co. of Hartford, Carriers, Defendants

Of which Property and Casualty Insurance Co. of Hartford., is the .....Appellant.

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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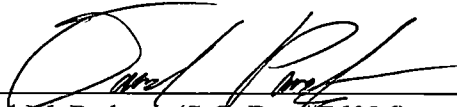
Appellant proposed the following be included in the Record on Appeal:

1. Form 50 Claimant's Request for Hearing dated July 1, 2014;
2. Form 51 Appellant's Answer to Hearing Request dated October 17, 2014;
3. APA submission, pp. 75-76;
4. Appellant's Exhibits to the Hearing Commissioner, Exhibits A, B, C, D, E, and F, pp. A1-A46, B1-B139, C1-C25, D1-D2, E-E3, F1-F2;
5. Transcript of proceedings from January 20, 2015, pp. 4-170;
6. Decision and Order of Single Commissioner dated July 30, 2015;
7. Form 30 Request for Commission Review dated August 13, 2015;
8. Appellant's Exhibit to the Full Commission Hearing, Exhibit C, pp. 1-5

9. Full Commission Hearing transcript dated April 18, 2016, pp. 3-24;
10. Decision and Order of the Full Commission panel dated June 20, 2016; and
11. Notice of Appeal to Court of Appeals dated July 19, 2016.

I certify that this designation contains no matter which is irrelevant to this appeal.

September 9, 2016



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David M. Padgett (S.C. Bar #76026)  
**Holder Padgett Littlejohn + Prickett, LLC**  
1204 A. East Washington Street  
Greenville, South Carolina 29601  
(864) 335-8808  
*Attorney for Appellant*

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Ignacio Javier Rodriguez, Employee, Claimant, Respondent,

v.

Robert T. Pierson, d/b/a Robert Pierson Construction Co., Employer, and  
ABC Care, Inc., Employers, Respondents,  
and

South Carolina Uninsured Employers' Fund, Property & Casualty Insurance Co. of  
Hartford, Carriers, Defendants

Of which Property & Casualty Insurance Co. of Hartford is the Appellant.

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PROOF OF SERVICE

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The undersigned hereby certifies that the Initial Brief of Appellant and Designation of Matter To Be Included In The Record on Appeal in the above referenced case has been served on all parties of record by mailing a copy of same in the United States mail, postage prepaid this 9<sup>th</sup> day of September, 2016, addressed as follows:

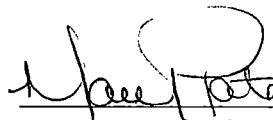
William H. Ehliès, Esquire  
310 Mills Avenue., Suite. 201  
Greenville, South Carolina 29605  
*Attorney for Respondent*

Randall S. Hiller, Esquire  
850-B Wade Hampton Boulevard  
Greenville, South Carolina 29609  
*Attorney for Robert T. Pierson, d/b/a Pierson Construction and ABC Care, Inc.*

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David H. Keller, Esquire  
Turner Padgett  
Post Office Box 1509  
Greenville, South Carolina 29602  
*Attorney for South Carolina Workers' Compensation Uninsured Employers Fund*

South Carolina Workers' Compensation Commission  
Post Office Box 1715  
Columbia, South Carolina 29202

A handwritten signature in cursive script, appearing to read "Mary Pate", written over a horizontal line.

Mary Pate, Paralegal  
Holder, Padgett, Littlejohn + Prickett, LLC

September 9, 2016

Honorable Jenny Abbott Kitchings  
Clerk of the Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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SC Court of Appeals

**RE: *Ignacio Javier Rodriguez, employee, claimant, Respondent, v.  
Robert T. Pierson, d/b/a Robert Pierson Construction Co., Employer, and ABC Care,  
Inc., Employers, Respondents, and South Carolina Uninsured Employers' Fund,  
Property & Casualty Insurance Co. of Hartford, Carriers, Defendants of which Property  
& Casualty Insurance Co. of Hartford is the Appellant.  
Appellate Case No. 2016-001497***

Dear Clerk:

Enclosed for filing is Property and Casualty Insurance Co. of Hartford's Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal with Proof of Service.

By copy of this letter, we are notifying all counsel of record.

Thank you for your assistance in this matter and please do not hesitate to contact our office if you have any questions.

Very truly yours,

HOLDER, PADGETT, LITTLEJOHN + PRICKETT, LLC

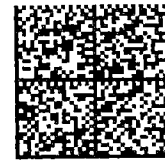
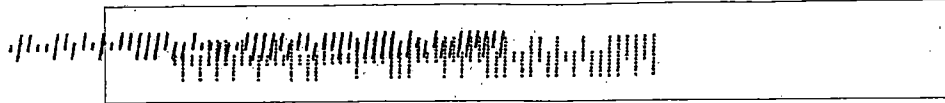


David M. Padgett

DMP:mp

Enclosures

cc: William H. Ehlies Esq.  
Randall S. Hiller, Esq.  
David H. Keller, Esq.  
South Carolina Workers' Compensation Commission  
Client



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