

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

SC Court of Appeals

Commissioners R. Michael Campbell, II, Avery B. Wilkerson, Jr., and Aisha Taylor

Appellate Case No.: 2015-002116

Danny B. Crane, Appellant,

v.

Raber's Discount Tire Rack, Employer, and
South Carolina Uninsured Employers Fund, Carrier, Respondents.


**DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL
(CORRECTED ON SEPTEMBER 13, 2016)**

Respondent proposes the following be included in the Record on Appeal:

1. Transcript of Hearing dated June 26, 2014; pages 1-11, 17- 83.
2. Claimant's Form 50.
3. Raber Form 51.
4. Fund Form 51.
5. Claimant's Form 58.
6. Claimant's APA submissions pages 1, 4-17, 19-29, 38-42, 47-53, 57.
7. Defense Exhibits A and C [**Exhibit A consisting of a Compact Disc showing security camera video recorded on February 19, 2014**].
8. Claimant's Motion to Submit Newly-Acquired Evidence with attached medical records and affidavit dated December 16, 2014.
9. Order dated April 30, 2015.
10. Order dated October 1, 2015.
11. Form 30 dated May 12, 2015.

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

Respectfully Submitted,



Stephen B. Samuels
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000
stephen@samuelslawfirm.net

R. Stephen Chandler
LAW OFFICES OF R. STEPHEN
CHANDLER, LLC
1548 Main Highway
P.O. Box 948
Bamberg, SC 29003
(803) 245-1800
Steve@BambergLaw.com

ATTORNEYS FOR APPELLANT

September 13, 2016
Columbia, South Carolina

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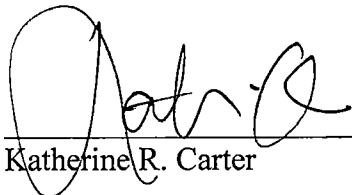
PROOF OF SERVICE

I certify that I, Katherine R. Carter, am a paralegal to Stephen B. Samuels and I have served the Appellant's **Designation of Matter to be Included in the Record on Appeal (Corrected on September 13, 2016)** upon the Respondents by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed as follows:

Lisa C. Glover, Esquire
P.O. Box 210039
Columbia, SC 29221-0039

Raber's Discount Tire Rack/
James Raber
1009 Dunbarton Blvd.
Barnwell, SC 29812

Matthew J Story, Esquire
Clawson & Staubes, LLC
126 Seven Farms Drive Suite 200
Charleston SC 29492-7595


Katherine R. Carter

September 14, 2016
Columbia, South Carolina



STEPHEN B. SAMUELS
ANDREW J. BROWN
ATTORNEYS AT LAW

September 14, 2016

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Via Hand Delivery

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

RE: Danny B. Crane v. Raber's Discount Tire Rack, et. al.
Appellate Care No. 2015-002116

Dear Ms. Kitchings:

Please find enclosed the original and one copy of **Designation of Matter to be Included in the Record on Appeal (Corrected on September 13, 2016)** and a Proof of Service, for filing in the above-referenced matter. Please file the originals and return the clocked copies with our courier.

This correction is made pursuant to correspondence from the Court addressing a deficiency in the original Designation of Matter, filed on March 2, 2016. In an effort to clarify the inclusion of a compact disc in the Record on Appeal, we have added additional language to described Item 7, Defense Exhibit A, for the Court. Please note, no additional items are being included in Appellant's Designation of Matter.

Additionally, at the request of the Court, labels with the text "Defendants' APA Exhibit A Security video footage dated 02/19/14" are being affixed to the previously filed compact disc's to further identify them to the Court.

By copy of this letter and enclosures to Matthew Story and Lisa Glover, counsel of record for the Carrier, and James Raber, *pro se* Employer, we are serving them with a copy of the **Designation of Matter to be Included in the Record on Appeal (Corrected on September 13, 2016)** as indicated by the attached Proof of Service.

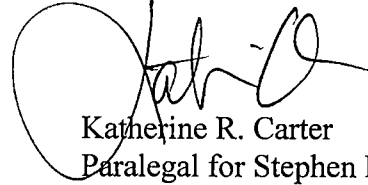
Thank you for your consideration in this matter. Please contact us with any questions or if further information is needed from our office.

WE WORK FOR THE PEOPLE WHO WORK.

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSLAWFIRM.NET

With kindest regards, I am

Respectfully,

A handwritten signature in black ink, appearing to read 'Katherine R. Carter', written over a large, light-colored circular stamp or watermark.

Katherine R. Carter
Paralegal for Stephen B. Samuels

/krc

Enclosure(s) as stated

cc: Steve Chandler, Esquire
Lisa C. Glover, Esquire
Matthew J. Story, Esquire
James Raber, Raber's Discount Tire Rack