

mgc

Reply To

HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

October 14, 2016

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

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OCT 17 2016

SC Court of Appeals

RE: Ronnie McDonald vs. Gregg Blakely and Walker, Hunter & Associates, Inc.
Date of Accident: January 7, 2013
WCC File No.: 1301480
Our File No.: 2069.14007
Claim No.: 0001-0145-10-0001
Appeal Tracking No.: 2016-000480

Dear Ms. Kitchings:

I am in receipt of your letter dated October 11, 2016 advising that the filing deadlines in this appeal are held in abeyance while this Court considers the pending Motion to Strike filed by Appellants. However, Respondent's counsel filed a Return to the Motion to Strike, agreeing to strike Designation #8 and providing a revised Designation with the required certification. (Att. A). This resolved the issues raised in Appellants' Motion to Strike. As a result, there is no further need for this Court to consider or decide Appellants' Motion to Strike. Based on Respondent's Return and revised Designation, Appellants have already filed and served the Record on Appeal and are filing and serving their final briefs today.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosure

cc: Joe Ann Calvy, Esq.

Attachment A

2069. 14007



Joe Ann Calvy, LLC

ATTORNEY AT LAW

P.O. Box 610 • 209 W. MILL STREET • KINGSTREE, SC 29556

TELEPHONE: (843) 354-9000
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September 15, 2016

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

Re: Ronnie McDonald vs. Gregg Blakely and Walker, Hunter & Associates, Inc.
Date of Accident: January 7, 2013
WCC File No.: 1301480
Our File No.: 2069.14007
Claim No.: 0001-0145-10-0001
Appeal Tracking No.: 2016-000480

Dear Ms. Kitchings:

Enclosed please find original and 7 copies of Respondent's Return to Appellants' Motion to Strike and/or Correct Respondent's Designation of Matter and original and 1 copy of the Proof of Service. Please file originals and return a clocked in copy of each in the provided envelope.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Ann Calvy".

Joe Ann Calvy
Attorney at Law

enc:

cc: Helen F. Hiser, Esquire

THE STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION
Appellate Panel

W.C.C. No. 1301480

Ronnie McDonald, Employees.....Respondent,

Employee/Claimant/Respondent,

v.

J Mac's Express, LLC, Direct Employer,

Employer/Appellant,

Gregg Blakely Logging, Inc., Statutory Employer and
WC Uninsured Employers' Fund and Palmetto Timber Fund, Carriers, Defendants

Of which Gregg Blakely Logging, Inc. and
Palmetto Timber Fund are the.....Appellants.

**RESPONDENT'S RETURN TO APPELLANTS' MOTION TO STRIKE AND/OR
CORRECT RESPONDENT'S DESIGNATION OF MATTER**

Appellants filed this motion to strike Respondent's Designation #8, with the exception of pages 1-9 of his APA submissions, and order his counsel to certify that her Designation does not contain any material that is irrelevant to this appeal. Respondent has filed a corrected Designation of Matter and has removed Designation #8. Respondent has also certified that the Designation contains no matter that is irrelevant to this appeal.

September 15, 2016

A handwritten signature in cursive script, appearing to read "Joe Ann Calvy", is written over a horizontal line.

Joe Ann Calvy, LLC

Joe Ann Calvy

P.O. Box 610

Kingstree, SC 29556

Telephone: (843) 354-5504

Facsimile: (843) 354-5845

E-Mail: jcalvy@sc.rr.com

Attorney for Respondent

THE STATE OF SOUTH CAROLINA
IN THE
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APPEAL FROM THE SOUTH CAROLINA
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v.

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Employer/Appellant,

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Of which Gregg Blakely Logging, Inc. and
Palmetto Timber Fund are the.....Appellants.

DESIGNATION OF MATTERS TO BE INCLUDED IN THE
RECORD ON APPEAL

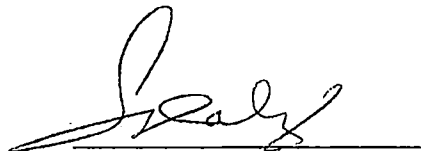
Respondent propose the following:

1. Single Commissioner Order, filed August 13, 2013;
2. Form 50, dated January 8, 2015;
3. Form 51, dated February 6, 2015;
4. Transcript of hearing before Single Commissioner dated March 25, 2015;
5. Single Commissioner Order filed July 15, 2015;
6. Form 30, dated July 27, 2015;
7. Full Commission Appellate Panel Transcript dated October 19, 2015;

8. Employer APA Submissions, page 163-167;
9. Order of Appellate Panel, filed February 11, 2016.

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

September 15, 2016



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Attorney for Respondent

THE STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS

APPEAL FROM THE SOUTH CAROLINA
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Appellate Panel

W.C.C. No. 1301480

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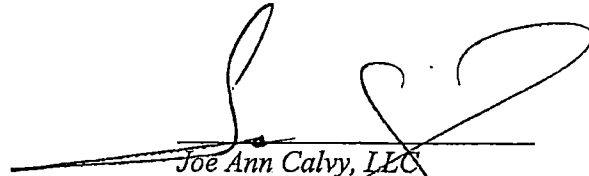
Gregg Blakely Logging, Inc., Statutory Employer and
WC Uninsured Employers' Fund and Palmetto Timber Fund, Carriers, Defendants

Of which Gregg Blakely Logging, Inc. and
Palmetto Timber Fund are the.....Appellants.

PROOF OF SERVICE

I CERTIFY that I have served the Respondent's Return to Appellants' Motion to Strike and/or Correct Respondent's Designation of Matter and Designation of Matter on the Appellants, by depositing a copy of it in the United States Mail, postage prepaid, on September 15, 2016, addressed to their attorney of record:

Helen F. Hiser, Esquire
MCANGUS GOUDELOCK & COURIE LLC
735 Johnnie Dodds Blvd., Suite 200
P. O. Box 650007
Mount Pleasant, South Carolina 29465

A handwritten signature in black ink, appearing to read "Joe Ann Calvy", is written over a horizontal line. The signature is stylized with large loops and a long horizontal stroke extending to the left.

Joe Ann Calvy, LLC
Joe Ann Calvy
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Attorney for Respondent

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**INSURANCE
DEFENSE**

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