

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

RECEIVED

WCC NO. 1320600

OCT 19 2016

SC Court of Appeals

Kevin M. Todd Appellant

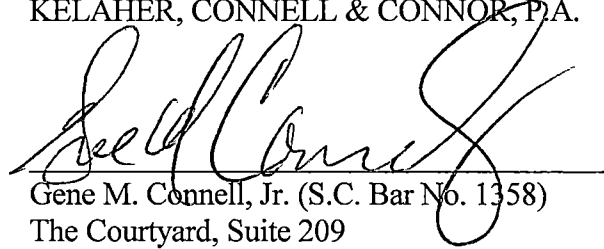
vs.

Michael Roberts d/b/a Michael Roberts Home Repair
and S.C. Uninsured Employers' Fund Respondents

MOTION FOR ORAL ARGUMENT

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellant, moves this Court for oral argument in this case. The basis of this motion is that there are unique facts in the application of the personal errand doctrine which are applicable to this matter which are applicable to other South Carolina Worker's Compensation cases throughout the State. Accordingly, Appellant requests that the Court schedule oral argument on this matter since this decision is of great public interest to South Carolina workers.

KELAHER, CONNELL & CONNOR, P.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)

The Courtyard, Suite 209

1500 U. S. Highway 17 North

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Attorney for Appellant

October 18, 2016

Surfside Beach, South Carolina

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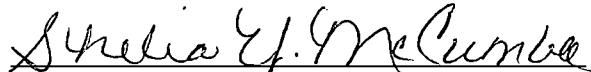
Michael Roberts d/b/a Michael Roberts Home Repair
and S.C. Uninsured Employers' Fund Respondents

PROOF OF SERVICE


PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served **Appellant's Motion for Oral Argument** on the Respondents, through counsel of record, and on the South Carolina Workers' Compensation Commission, by depositing a copy of same in the United States Mail, postage prepaid, to:

Lisa C. Glover, Esquire
S. C. State Accident Fund
S. C. Uninsured Employers' Fund
Post Office Box 210039
Columbia, SC 29221

DATE OF MAILING: October 18, 2016


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 18 day of October, 2016.


Notary Public for South Carolina
My Commission Expires: 2-17-19

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

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GENE M. CONNELL, JR.
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LISA POE DAVIS

* OF COUNSEL

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FAX: 238-5050

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SC Court of Appeals

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

Re: *Kevin M. Todd v. Michael Roberts d/b/a Michael Roberts Home Repair and
S.C. Uninsured Employers' Fund*
Appellate Case No. 2016-000181
W.C.C. File No. 1320600
Our File No. 2014-0046C

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion for Oral Argument and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, I hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm

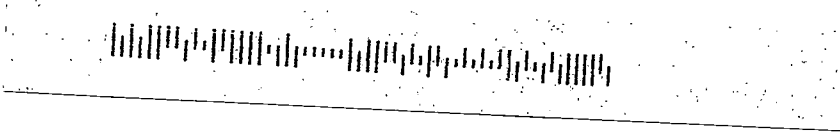
Enclosures

cc w/enc.: Lisa C. Glover, Esquire



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To

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