

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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

RECEIVED

Appellate Case No.: 2016-001257
W.C.C. File No.: 1414851

MAY 05 2017

SC Court of Appeals

Michael ThompsonAppellant,

v.

KMS, Inc./Bridgefield Casualty Insurance Company c/o Summit Holdings, Inc. Respondents.

RETURN TO "MOTION FOR REVERSAL AND FULL REMAND DUE TO NON-COMPLIANCE OF AN ORDER FROM THE COURT OF APPEALS ON 03/02/17"

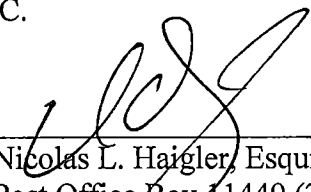
Respondents respectfully request the Court deny Appellant's motion. Pursuant to the Order of the Court filed March 2, 2017, and Rule 208(b)(4), SCACR, Respondents filed an Amended Initial Brief on March 31, 2017, to include references to the record. Rule 208(b)(4), SCACR provides, "In the initial briefs, these references should be to the page and line number of the transcript prepared by the court reporter *or by the page of the material to be referenced.*" The rule also provides the following examples of references: "Answer p. 7, Motion for Judgment p. 2, Transcript p. 231." *Id.* Additionally, the rule states "Intelligible abbreviations may be used." Consequently, the citations Respondents provided in the Amended Initial Brief are directly in line with the rule and the examples provided within the rule.

Accordingly, Respondents request the Court deny Appellant's Motion and order Appellant to refrain from continuing to file frivolous motions for the purposes of delay. *See* Rule 269, SCACR (providing that where a motion is frivolous or taken solely for the purposes of delay, the appellate court may impose sanctions upon the offending party).

Respectfully submitted,

SOWELL GRAY ROBINSON STEPP & LAFFITTE,
L.L.C.

By: _____


Nicolas L. Haigler, Esquire
Post Office Box 11449 (29211)
1310 Gadsden Street
Columbia, SC 29201
803) 929-1400

ATTORNEY FOR THE RESPONDENTS

Columbia, South Carolina

May 5, 2017

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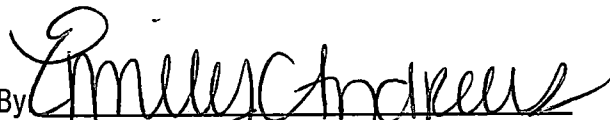
Michael Thompson Appellant,

v.

KMS, Inc./Bridgefield Casualty Insurance Company c/o Summit Holdings, Inc..... Respondents.

PROOF OF SERVICE

I certify that I have served a copy of the Respondents' Return to "Motion for reversal and full remand due to non-compliance of an Order from the Court Of Appeals on 03/02/17", on the following: Michael Thompson, Pro Se, 116 School Bus Road, West Columbia, SC 29172 (via Certified Mail and U.S. Mail) and Honorable Jenny Abbott Kitchings, Judicial Director, South Carolina Court of Appeals, 1015 Sumter Street, Columbia, SC 29201 (via hand-delivery), on May 5, 2017.

By 

Emily S. Andrews
Sowell Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Post Office Box 11449
Columbia, South Carolina 29211



**SOWELL GRAY
ROBINSON**

Litigation + Business

NICOLAS L. HAIGLER
Direct Dial 803 231.7847
Direct Fax 803 231.7853
Email nhaigler@sowellgray.com

May 5, 2017

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: Michael S. Thompson v. KMS, Inc.
WCC File No.: 1414851
Date of Accident: 10/08/14
Appellate Case No.: 2016-001257
Our File No.: 6288/8124

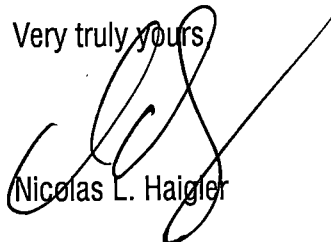
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Dear Ms. Kitchings:

Please find enclosed herewith the original and seven (7) copies of the Respondents' Return to "Motion for Reversal and Full Remand due to Non-Compliance of an Order from the Court Of Appeals on 03/02/17", regarding the above-referenced matter. We would appreciate your filing the original and six copies. We request a clocked-in copy of same returned to us via our courier.

By copy of this letter and aforementioned documents to the Appellant, we are serving him with a copy of these documents.

Very truly yours



Nicolas L. Haigler

NLH:esa

Enclosures

cc: Mr. Michael S. Thompson (via Certified Mail and U.S. Mail)
Ms. Kiema Lewis (via email)
Ms. Kerri Dolan (via email)