

# WMA

WILLS MASSALON & ALLEN LLC

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December 27, 2012

Direct Dial: (843) 793-6040

The Honorable Daniel E. Shearouse  
Clerk of Court Supreme Court  
Supreme Court of SC  
P.O. Box 11330  
Columbia, SC 29211

RE: Jeffrey D. Allen, on behalf of Jane Doe v. South Carolina Public Employee Benefit Authority, Employee Insurance Program  
Case No. 2012-213186  
File No. 595-1

Dear Mr. Shearouse:

In regards to the above-referenced matter, enclosed for filing please find the original and one (1) copy of the proof of service for the Appellant's Record on Appeal Volumes 1-III, along with a self-addressed, stamped envelope. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



Christy Ford Allen Esquire  
[callen@wmalawfirm.net](mailto:callen@wmalawfirm.net)

Enclosures

cc: Terry E. Richardson, Jr., Esquire (w/o enclosure)  
Theodore D. Willard, Jr., Esquire (w/o enclosure)  
Steven Van Camp, Esquire (w/o enclosure)

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DEC 31 2012

S.C. Supreme Court

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Theodore D. Willard, Jr., Esquire  
Montgomery Willard, LLC  
Post Office Box 11886  
Columbia, South Carolina 29211

Steven Van Camp, Esquire  
SC Public Employee Benefit Authority  
1201 Main Street, Ste. 300  
Columbia, South Carolina 29201

RE: Jeffrey D. Allen, individually, as guardian for Jane Doe, a minor, and as representative of other similarly situated State of South Carolina employees v. South Carolina Budget and Control Board Employee Insurance Program and Blue Cross and Blue Shield of South Carolina  
Supreme Court Appellate Case No: 2012-213186  
Circuit Court Case No.: 2009-CP-10-7404  
File No. 595-1

Dear Bo and Steven:

In regard to the above-referenced matter, enclosed please find a copy of the Record on Appeal Volume I-III, along with the Proof of Service which will be submitted to the Supreme Court for filing. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



Christy Ford Allen  
[callen@wmalawfirm.net](mailto:callen@wmalawfirm.net)

Enclosures

cc: Terry E. Richardson, Jr.  
The Honorable Daniel E. Shearouse

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THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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DEC 31 2012

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S.C. Supreme Court

Shirley C. Robinson, Administrative Law Judge

Appellate Case No. 2012-213186

Jeffrey D. Allen, on behalf of Jane Doe

.....Appellant,

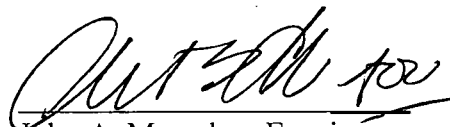
v.

South Carolina Public Employee Benefit Authority,

Employee Insurance Program.....Respondent.

**PROOF OF SERVICE  
OF RECORD ON APPEAL**

I certify that I have served the Record on Appeal Volume I-III by depositing a copy of it in the United States Mail, postage prepaid, on December 27, 2012, addressed to their attorneys of record, Theodore D. Willard, Jr., Montgomery Willard, LLC, P.O. Box 11886, Columbia, SC, 29211 and Steven Van Camp, South Carolina Public Employee Benefit Employee Insurance Program, State Budget & Control Board, 1201 Main Street, Suite 300, Columbia, SC 29201.



John A. Massalon, Esquire  
Wills Massalon & Allen LLC  
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Terry E. Richardson, Jr., Esquire  
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LLC

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SC Bar Number: 04721  
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Attorneys for Appellant

Other Counsel of Record:

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P.O. Box 11886  
Columbia, SC, 29211

Steven Van Camp  
South Carolina Public Employee Benefit  
Employee Insurance Program  
1201 Main Street, Suite 300  
Columbia, SC 29201  
Attorneys for Respondent