

# GIBSON LAW FIRM, LLC

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September 18, 2018

**Via First Class Over Night Mail**

South Carolina Court of Appeals  
Attention: Mary Caitlin  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
SEP 19 2018  
SC Court of Appeals

**Re:** Client/Respondent: Veronica Rodriguez Texacahua  
Date of Injury: December 5, 2016  
Employer/Appellant: Peggy Evers, Cleaner Concepts/NorGuard Ins. Co.  
WCC File No.: 1619767  
Appellate No.: 2018-001111

Dear Ms. Mary Caitlin:

Though I have not yet received the mailed copy of the Record on Appeal (ROA), opposing counsel kindly sent me a copy yesterday which I have now reviewed. I am confident the hurricane and closed post office have caused the mail problem.

In reviewing the Appellant's Record on Appeal "ROA", I see that **appellants omitted our 2nd designated item - "WCC Admin. Order (3/26/2018)"; they further failed to attach the cover page of the transcript, we designated as "Hearing Transcript excerpt, Cover page; pp 21-22; 89-90; 92; and, Certificate p 98 (11/3/2017)".**

I also notice that **appellants** include prohibited duplicates of:

- 3 copies of the 4/16 Order (ROA pp 16; 43; 68);**
- 3 copies of their 3/27 cover letter and mot to reinstate (ROA pp 35; 44; 69);**
- 2 copies of the 5/21 Order (ROA pp 17; 61); and**
- 2 copies of their cover letter and amended motion (ROA pp 49; 62).**

These errors violate the rules and their certificate that they have not included irrelevant matters and have included everything we designated. (see last page of ROA)..

As a result of these defects, my questions to you are the following:

- 1. Am I allowed to attach the omitted 3/26/2018 WCC Admin Order to our Final Brief, or whether you will instruct the appellant to prepare an amended ROA?**
- 2. What are my current deadlines?**
- 3. What will the deadline be, should the appellant be required to amend their ROA?**

I look forward to hearing back from you concerning these issues.

With kindest regards, I remain

Sincerely yours,



Don C. Gibson

DCG/djk

Enclosures: as stated

cc: Claimant

Kevin Desmond Maroney, Esquire  
Mr. George D. Gallagher, Esquire

**Proof of Services**

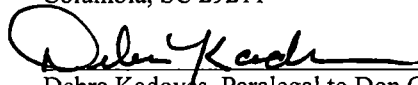
**Via First Class Mail**

Mr. Kevin Desmond Maroney, Esquire and  
P.O. Box 11669  
Columbia, SC 29211

North Charleston SC  
September 18, 2018

**Via First Class Mail**

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Columbia, SC 29211



Debra Kadoves, Paralegal to Don C. Gibson

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