

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 1103442

Gayla Ramey, Employee Appellant/Respondent,

v.

Unihealth Post Acute Care Tanglewood, Employer, and American Zurich Insurance Company,
Carrier, Respondents/Appellants.

RESPONDENT'S BRIEF OF APPELLANT/RESPONDENT

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STATEMENT OF ISSUES ON APPEAL

Claimant's Appeal:

1. Did the Workers' Compensation Commission err as a matter of law in basing the Average Weekly Wage on the previous 4 quarters when basing it on the previous 52 weeks was consistent with the statute and would have been more fair to the parties?

Employer and Carrier's Appeal:

2. Whether substantial evidence supports the Commission's factual findings that Ramey was on light duty restrictions from March 24, 2011 and that the Employer unilaterally withdrew its offer of employment suitable to her capacity; thus requiring the Employer to pay temporary total disability compensation benefits during Ramey's period of disability?

STATEMENT OF THE CASE

This appeal arises out of a workers' compensation claim filed by the Appellant/Respondent, Gayla Ramey. Ramey was employed for nine years as a registered nurse for the Employer Unihealth Post Acute Care. Employer was insured by American Zurich Insurance Company.

On March 11, 2011, she suffered an injury by accident of when she fell on a flight of steps. Ramey injured her back and right arm. The Employer and Carrier accepted her claim and provided medical benefits.

On March 21, 2011, Employer discharged Ramey allegedly for falsifying records to get paid for one hour on March 18, 2011, while she was at the doctor that day treating for her injuries. Thereafter, the Employer refused to pay temporary total disability compensation despite Ramey being under work restrictions and not at maximum medical improvement..

Ramey timely filed a Form 50 (Request for Hearing) seeking medical treatment and temporary total disability compensation from the date of her termination and continuing. [R. p. 30]. Employer timely filed a Form 51 denying the claim for temporary compensation on the grounds that Ramey had been fired for cause. [R. p. 33].

A hearing was held before Commissioner Bryan G. Lyndon on August 10, 2011. Commissioner Lyndon issued a Decision and Order on September 28, 2011. [R. pp. 3-16]. In that Order, the Commissioner ordered the Employer to pay "temporary total disability compensation from March 24, 2011 to the present and continuing." [R. p. 14]. He also set the compensation rate at \$671.58 based on an average weekly wage of \$1,007.32 as calculated on the Form 20 prepared by the Employer. [R. p. 10, Finding of Fact 1].

Both parties timely appealed from this Order. Ramey appealed the rulings regarding the

compensation rate. Employer appealed the requirement to pay temporary total disability compensation from March 24, 2011.

The Appellate Panel heard oral arguments on March 20, 2012. By Decision and Order dated May 23, 2012, the Appellate Panel affirmed the Decision and Order of the Single Commissioner. [R. pp. 17-28].

These cross-appeals followed.

STATEMENT OF THE FACTS

Gayla Ramey was employed for nine years as a registered nurse for the Employer Unihealth Post Acute Care. Her job duties included numerous physical tasks including turning patients, helping patients move, and helping patients get in and out of wheelchairs.

On March 11, 2011, Ramey clocked in with a hand scanner. Shortly thereafter, she fell, was injured, and was immediately sent to Doctor's Care for treatment. She did not clock out when she went to the doctor and was paid for her normal hours – including the time at the doctor's office.

Doctor's Care put Ramey on work restrictions of no more than 30 minutes per hour on her feet; limited use of the back; no use of the right arm; 10-pound lifting restriction; and no repetitive bending, twisting, stooping, squatting or pushing. [R. pp. 342-343]. The Employer refused to respect these restrictions and kept her working full duty. Two other employees, Tammy Watkins and Lisa Jacobs, were also required to work full duty despite being under medical restrictions from work-related injuries.

On March 18, 2011, Ramey returned to Doctor's Care. She asked the doctor to take her off work restrictions because she needed to help with understaffing on her floor and she was afraid she would be fired if she remained under medical restrictions.

As the hand scanner was not working that day, Ramey was required to submit a written "request for missed time" form. Both of her immediate supervisors, Carrie Ray and Tonya Shephard, reviewed and approved the form as submitted. Both supervisors knew Ramey had left work for her doctor's appointment that morning when they approved the form. Ramey submitted time from 7:00 a.m. to 10:30 a.m. – which included the roughly one hour she spent going to the doctor.

On March 21, 2011, Employer discharged Ramey allegedly for falsifying records to get paid for the one hour she was at the doctor on March 18th.

Ramey returned to Doctor's Care on March 24, 2011. [R. p. 350]. She was placed back on work restrictions. [R. p. 351]. Ramey returned several more times to Doctor's Care – she was continued on work restrictions at each visit. [R. pp. 351-360]. Her last visit was on April 8, 2011 when she was referred to an orthopaedic surgeon. [R. p. 358]. Defendants refused to provide medical care from that point forward until the day of the hearing. [R. p. 100, lines 2-6].

Ramey was seen by Dr. Timothy Zgleszewski on July 19, 2011. Dr. Zgleszewski opined she was not at MMI, required additional treatment for her injuries, and “would be at risk for further injury if she returns to work before the additional treatment is rendered.” [R. pp. 365-369].

A hearing was held before Commissioner G. Bryan Lyndon on August 10, 2011. In the pre-trial conference, Employer conceded it was required to provide treatment through an orthopaedic surgeon. The hearing went forward on two issues: (1) whether Employer was required to pay temporary total disability compensation; and (2) the average weekly wage and compensation rate.

At the hearing, Employer denied Ramey should receive temporary total disability benefits because she was terminated for cause. [R. p. 102, lines 8-12]. Commissioner Lyndon ordered the Employer to pay “temporary total disability compensation from March 24, 2011 to the present and continuing.” [R. p. 14].

The Commissioner also set the compensation rate at \$671.58 based on an average weekly wage of \$1,007.32 as calculated on the Form 20 prepared by the Employer. Ramey had argued for a compensation rate of \$704.32 based on an average weekly wage of \$1099.17. The figure was based on her actual earnings over the 52 weeks immediately prior to her accident.

STANDARD OF REVIEW

In reviewing Workers' Compensation Commission's decision, an appellate court must affirm the Commission's factual findings if they are supported by substantial evidence and not controlled by legal error. Tiller v. National Health Care Center, 334 S.C. 333, 513 S.E.2d 843 (1999). "An appellate court may not substitute its judgment for that of an agency as to the weight of the evidence on questions of fact unless the agency's findings are clearly erroneous in view of the reliable, probative, and substantial evidence on the record." Tiller, 334 S.C. at 339, 513 S.E.2d at 845.

The findings of the Commission are presumed correct and will be set aside only if unsupported by substantial evidence. Rodney v. Michelin Tire Corp., 320 S.C. 515, 466 S.E.2d 357 (1996). Substantial evidence is not a mere scintilla of evidence, nor the evidence viewed blindly from one side of the case, but is evidence which, considering the record as a whole, would allow reasonable minds to reach the conclusion the administrative agency reached in order to justify its action. Miller v. State Roofing Co., 312 S.C. 452, 441 S.E.2d 323 (1994). Where there is a conflict in the evidence, either by different witnesses or in testimony of the same witness, findings of fact of the Commission are conclusive. Tiller v. National Health Care Center, 334 S.C. 333, 513 S.E.2d 843 (1999).

ARGUMENT

1. Gayla Ramey is entitled to ongoing temporary total disability compensation because she is disabled due to her injury and the Employer has not provided employment suitable to her capacity since March 21, 2011.

The Appellate Panel properly found Ramey was entitled to temporary total disability compensation from March 24, 2011. As a matter of law, an Employer must either provide employment suitable to an injured worker's capacity or pay temporary total disability compensation. As Ramey had not reached MMI and no suitable employment was offered, the Appellate Panel's award of temporary total disability compensation must be affirmed.

A. As Ramey was partially incapacitated at the time of her termination, she was entitled to receive temporary total disability compensation [in response to Employer's argument at page 17].

Employer argues that Ramey is not entitled to receive temporary compensation because "at the time of Claimant's termination, she had been released from any restrictions by her treating physician and had returned to full duty." [Brief of Respondents/Appellants at page 17]. As a procedural matter, this conclusory argument has been abandoned due to the failure to cite any legal authority. See Rule 208(b)(1)(D), SCACR (requiring citation to authority in the argument section of an appellant's brief); First Sav. Bank v. McLean, 314 S.C. 361, 363, 444 S.E.2d 513, 514 (1994) (noting when a party fails to cite authority or when the argument is simply a conclusory statement, the party is deemed to have abandoned the issue on appeal).

Even if the Court finds the issue preserved, the argument fails. Although there is a release to full duty from Doctor's Care on March 18, 2011, there is also testimony that the only reason for the release was because Ramey specifically asked to try full duty from fear she would lose her job

if she did not get back to full duty. Even more importantly, Ramey was placed back on medical restrictions on the very next doctor's visit on March 24, 2011. [R. p. 351]. This is the date the Commission used as the starting point for temporary compensation to begin. Ramey continued on work restrictions from then on and has never been released to work without restriction. See Cranford v. Hutchinson Construction, 731 S.E.2d 303, 399 S.C. 65 (Ct. App. 2012)(employer "required to pay [claimant] temporary disability benefits from the day after his termination . . . until he achieved MMI and was authorized to return to work without restriction").

Therefore, this Court should affirm the Commission's award of temporary total disability compensation payable from March 24, 2012.

B. An Employer cannot evade liability for temporary total disability benefits by terminating an injured employee [in response to Employer's argument at pages 17-19].

Employer argues "the substantial evidence shows that Claimant was terminated for cause, which constitutes an unjustified refusal of suitable employment." [Brief of Respondents/Appellants at page 17]. This argument has no merit because, as a matter of law, an employer's purported reason for terminating an employee is not relevant to the legal obligation to pay temporary compensation. Such a rule would be completely contrary to established South Carolina law; would violate public policy; and would impermissibly turn the Commission into a forum to litigate employment related issues. See Smith v. South Carolina Dept. of Mental Health, 329 S.C. 485, 494 S.E.2d 630 (Ct.App. 1997)(reason employer fired claimant are not "strictly relevant to the matter before the commissioner [and] are matters that must be resolved in state or federal court, not before the Workers' Compensation Commission."). Moreover, such a rule would be particularly draconian in this case where the termination arose out of an innocent misunderstanding over whether the company paid for

time spent going to the doctor.

Even if it were relevant, the Commission found as a fact that “It was the Claimant’s clear understanding based upon the acts and information given by the Employer that led the Claimant to believe she was to be paid for time missed from work for her medical appointments.” [R. p. 12, Finding of Fact 8]. The Commission further found “it was obvious she was not trying to falsify records, deceive the Employer, or hide anything else.” [R. pp. 12-13, Finding of Fact 14]. As these findings are based on the testimony of both Gayla Ramey and the Employer’s HR Director, Linda Burr, they are supported by substantial evidence. As there is no factual finding that Ramey committed any misconduct that would support a firing for cause, Employer’s argument fails for a lack of proof.

Even if there were evidence to support the Employer’s argument, it is legally incorrect and must be rejected by this Court. As a matter of law, when the injured worker is under work restrictions, the employer must either offer suitable employment within the injured worker’s capacity or pay temporary total disability compensation. See S.C. Code Ann. § 42-9-190 (2005); S.C. Code Ann. § 42-9-200 (2007)(“if the injury results in disability of more than fourteen days, compensation shall be allowed from the date of disability”); S.C. Code Ann. § 42-9-260(A) (Supp. 2006); 25A S.C. Code Ann. Reg. 67-502 (2007)(defining “disability”, “return to work without restriction”, and “temporary partial incapacity”); Last v. MSI Const. Co., Inc., 305 S.C. 349, 409 S.E.2d 334 (1991)(fact that incarcerated claimant remained unemployable for reasons other than his injury was not dispositive of his right to temporary compensation; rather, the issue was whether the injury had resulted in some loss of his earning capacity). See also Grayson v. Carter Rhoad Furniture, 317 S.C. 306, 454 S.E.2d 320 (1996)(temporary compensation improperly suspended because claimant

not at MMI and still under restrictions by the doctor, thus no evidence period of temporary total disability ever ended); Hines v. Hendricks Canning Co., 263 S.C. 399, 211 S.E.2d 220 (1975)(allowing an employee temporary total benefits and rejecting the carrier's argument that the claimant's loss of earning capacity was caused by his full-time attendance at school rather than his work-related injury). Cf. Orr v. Elastomeric Products, 323 S.C. 342, 474 S.E.2d 448 (Ct. App. 1996)(claimant's inability to work was still due to her injury and not to her pregnancy and that the prolongation, caused by the pregnancy, of the period of temporary disability did not alter that overriding fact).

The Commission lacks statutory authority to make findings on why an employee was terminated – or to bar compensation on this ground. See Smith v. South Carolina Department of Mental Health, 329 S.C. 485, 494 S.E.2d 630 (Ct. App. 1997)(“we do not believe [issues of why claimant was terminated] were strictly relevant to the matter before the commissioner--whether [employer] was entitled to discontinue the disability payments being made to [claimant].”). The sole inquiry is whether employment was offered suitable to the employee’s capacity and whether the employee accepted it. Here, there is no question Ramey accepted the work that was offered. The Employer *unilaterally* withdrew the offer of suitable employment. As such, it *must* pay temporary compensation.

The one administrative agency with authority to bar statutory benefits for termination for cause is the Department of Employment and Workforce (formerly the Employment Security Commission). See S.C. Code Ann. § 41-35-120 (2010)(“ worker is ineligible for benefits for: Discharge for cause connected with the employment.”). It makes logical sense to bar unemployment compensation to workers fired for misconduct since the very philosophy underlying unemployment

compensation is to protect workers who lose their jobs through no fault of their own. Employees who voluntarily quit are ineligible for unemployment compensation, as are those who are terminated for cause.

As the Workers' Compensation Commission has no similar statute, the Commission lacks authority to bar temporary compensation to a disabled employee fired from a light duty position for cause. The Commission simply cannot create barriers to payment of compensation out of whole cloth – particularly when those barriers not only have no statutory support, but actually contradict the statute. Moreover, the policy considerations underlying workers' compensation are radically different than those underlying unemployment compensation. Any flexibility the Commission has must be “exercise[d] . . . in making compensation awards to ensure the best interests of the workers are protected to the extent the award is not otherwise prohibited by the Workers' Compensation Act.” James v. Anne's Inc., 390 S.C. 188, 701 S.E.2d 730 (2010).

Here, the Employer unilaterally withdrew its offer of light duty work to Ramey – essentially failing to mitigate its damages. At the time of her involuntary termination Ramey was under work restrictions due to her injury. Even if there is a dispute over whether she was under restrictions on the day she was fired, it is undisputed she was under restrictions on March 24, 2011 – which is the date the Commission ordered temporary compensation to commence. These restrictions disqualified her from working in her occupation. As she was considered to be disabled under the Act, Ramey's loss of earnings capacity is a direct result of the limitations resulting from her work injury. See S.C. Code Ann. § 42-1-120 (2007) (“The term ‘disability’ means incapacity because of injury to earn the wages which the employee was receiving at the time of injury in the same or any other employment.”). Therefore, the Decision and Order of the Commission should be affirmed and this

Court should hold Ramey is entitled to receive temporary total disability compensation as a matter of law.

C. Ramey is entitled to receive temporary total disability compensation because the Employer failed to provide employment suitable to her capacity [in response to Employer's argument at pages 19-20].

Employer raises the creative argument that an injured worker whose employer is unwilling or unable to offer employment suitable to her capacity must be *totally disabled from all employment* as a condition of receiving temporary total disability compensation. This has never been the law in South Carolina; indeed, it is patently contrary to our law.

Employer states: “‘Disability’ in the workers’ comp context is defined as an inability to earn the same wages as the injured employee earned pre-injury.” [Appellants’ Brief of Respondents/Appellants at 19]. Although Employer references § 42-1-120, this is not the definition contained in the statute. The statute actually reads: “The term ‘disability’ means incapacity because of injury to earn the wages which the employee was receiving at the time of injury in the same or any other employment.” S.C. Code Ann. § 42-1-120 (2007). The Commission found as a fact that Ramey “is temporarily totally disabled.” [R. p. 13, Finding of Fact 15]. This finding satisfies the statute as the Commission also found Ramey’s work restrictions disqualified her from working all the duties of her job. [Order, Finding of Fact 9].

This Court definitively dispensed with a similar argument by an employer in Cranford v. Hutchinson Construction, 731 S.E.2d 303, 399 S.C. 65 (Ct. App. 2012). In Cranford, the Commission held the employee failed to prove his entitlement to temporary compensation after being terminated by his employer 17 days after returning to light duty work. Contrary to the Commission’s findings, the evidence showed Cranford had not been returned to work without

restriction and had not reached maximum medical improvement. This Court held the employer was “required to pay Cranford temporary disability benefits from the day after his termination . . . until he achieved MMI and was authorized to return to work without restriction.” Id. Cranford had briefly returned to work for another employer, albeit at a lower wage. Neither the fact he found other work nor the fact he was laid off by the other employer after a short time had an bearing on his basic right to receive temporary compensation.

There is no duty on the part of the injured worker to seek alternative employment during his period of disability. Indeed, to do so would frustrate one of the key purposes of the Act: to return injured workers back to work with the same employer. See S.C. Code § 42-9-160 and 42-9-170 (2005)(relieving employer from paying double compensation to employee drawing compensation for previous injury in same employment); State Workers' Compensation Fund v. South Carolina Second Injury Fund, 313 S.C. 536, 443 S.E.2d 546 (1994)(“The primary purpose of subsequent injury fund legislation is to encourage employers to hire handicapped persons, or to retain employees who become partially disabled in the course and scope of their employment.”). As it is undisputed that Ramey was still partially disabled and had not reached MMI, she is entitled to receive temporary compensation as a matter of law.

The only remaining question before this Court is whether Ramey must prove she was unable to obtain other employment before she can receive temporary total disability compensation. The entire statutory and regulatory scheme makes it clear she need not do so. If an employer is permitted to suspend temporary compensation *only* if an employee is *actually* working, then surely the employer cannot be permitted to withhold temporary compensation because an employee has not secured a new job with a different employer. See Grayson v. Carter Rhoad Furniture, 317 S.C. 306,

454 S.E.2d 320 (1996)(temporary compensation improperly suspended because claimant not at MMI and under restrictions by the doctor, thus no evidence period of temporary total disability ever ended); Hines v. Hendricks Canning Co., 263 S.C. 399, 211 S.E.2d 220 (1975)(allowing an employee temporary total benefits and rejecting the carrier's argument that the claimant's loss of earning capacity was caused by his full-time attendance at school rather than his work-related injury). Cf. Orr v. Elastomeric Products, 323 S.C. 342, 474 S.E.2d 448 (Ct. App. 1996)(claimant's inability to work was still due to her injury and not to her pregnancy and that the prolongation, caused by the pregnancy, of the period of temporary disability did not alter that overriding fact).

There is a sound policy basis underlying this rule. The hope is that upon recovery from their injuries, injured workers will be able to return to their previous employment. Workers' compensation claimants are one of the few classes of workers in South Carolina that enjoy some measure of statutory job security. See S.C. Code Ann. § 41-1-80 (1985)(prohibiting discharge or demotion in retaliation for instituting a workers' compensation claim). Requiring injured workers to look for new jobs would greatly lessen the likelihood they would return to work with their original employers. Moreover, a rule excusing employers from paying temporary compensation would create an incentive for employers not to offer light duty to injured workers or even manufacture reasons to fire them outright – as apparently happened in this case.

This Court should reject the Employer's argument and affirm the Appellate Panel.

2. The findings of fact of the Appellate Panel are both internally consistent and supported by substantial evidence [in response to Employer's argument at pages 20-24].

A proper review of the Appellate Panel's material factual findings shows they are both internally consistent and supported by substantial evidence. If there are any inconsistencies, they are

not material and would not change the ultimate result; thus, this Court should affirm the result under a harmless error analysis. See McCollum v. Singer Co., 386 S.E.2d 471, 300 S.C. 103 (Ct.App. 1989)(unless prejudice to the complaining party has resulted therefrom, an error is harmless error and not sufficient for reversal).

A. The Hand Scanner [in response to Employer's argument at pages 20-21].

Employer points out that the Appellate Panel made a finding that on March 11, 2011, “the hand-scanning device did not work;” while making a contrary finding that “the hand-scanner was working that day.” [Brief of Respondents/Appellants at page 17]. Neither of these findings bear on the actual result of the trial –which is that Gayla Ramey is entitled to be paid temporary total disability compensation as a matter of law. Whether Ramey committed misconduct leading to termination is irrelevant as a matter of law. Even if it were relevant, the Commission found as a fact that “It was the Claimant’s clear understanding based upon the acts and information given by the Employer that led the Claimant to believe she was to be paid for time missed from work for her medical appointments.” [R. p. 12, Finding of Fact 8]. Whether or not the hand-scanner was working on March 11, 2011 is not a material fact. Employer suffered no prejudice from the inconsistent findings, therefore, any error is insufficient grounds for this Court to reverse the decision below. McCollum v. Singer Co., 386 S.E.2d 471, 300 S.C. 103 (Ct.App. 1989).

B. Work Restrictions [in response to Employer's argument at pages 21-22].

Employer argues at length that the Appellate Panel’s finding that Ramey ““continued to work even though outside of her work restrictions’ from March 11 to March 18” is unsupported by substantial evidence. [Brief of Respondents/Appellants at page 17].

To begin with, there is ample testimony from both witnesses that Ramey worked outside her

restrictions during this time period. Ultimately though, it doesn't matter. The Commission ordered the Employer to pay temporary total disability compensation from March 24, 2011 – a period during which it is undisputed that Ramey was under work restrictions and the Employer offered no employment suitable to her capacity. As such, even if the finding was erroneous, it is harmless error. McCollum v. Singer Co., 386 S.E.2d 471, 300 S.C. 103 (Ct.App. 1989).

C. Pay [in response to Employer's argument at page 23].

There is no merit to Employer's argument that there is no substantial evidence to support the finding that Ramey believed she would be paid for time spent attending doctor's appointment related to her injury. The Employer paid Ramey for the time she left work to attend the first appointment at Doctor's Care after her accident on March 11, 2011. [R. p. 108, lines 6-14]. From this testimony, it was reasonable for the Commission to infer that she believed she would continue to be paid for other doctor's visits.

This finding is supported by substantial evidence and must be affirmed. Moreover, there is no prejudice to the Employer and no grounds for reversal even if the finding had been in error.

McCollum v. Singer Co., 386 S.E.2d 471, 300 S.C. 103 (Ct.App. 1989)

D. Claimant's Credibility [in response to Employer's argument at pages 23-24].

As a general rule, the Commission's credibility findings are not subject to appellate review. The exception would be if the findings are so arbitrary or capricious as to constitute an error of law. Houston v. Deloach & Deloach, 378 S.C. 543, 663 S.E.2d 85 (Ct. App. 2008) ("The appellate court is prohibited from overturning findings of fact of the Appellate Panel unless there is no reasonable probability the facts could be as related by the witness upon whose testimony the finding was based."); see, also Stallcup v. Carolina Wood Turning, Co., 7 S.E.2d 550 (N.C. 1940)(Seawell, J.


dissenting)(“How far the Industrial Commission may be indulged in refusing to believe credible testimony is still to be worked out, but its arbitrary disregard of positive testimony and the substitution therefor of mere speculation is within the power of review and correction by this Court.”).

There are no material inconsistencies in Ramey’s testimony. She was never impeached with prior inconsistent statements or actions. Indeed, her testimony was essentially consistent with that of the Employer’s witness. Under the deferential standard given to the Commission’s credibility findings, there are no grounds to reverse.

CONCLUSION

For the foregoing reasons, the Decision and Order of the Appellate Panel awarding workers’ compensation benefits to Gayla Ramey should be affirmed. For the reasons argued in the Appellant’s Brief of Appellant/Respondent, the Decision and Order should be reversed and modified as to Ramey’s average weekly wage and compensation rate.

Respectfully submitted,



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CERTIFICATE OF COUNSEL

The undersigned certifies that this Final Brief of Respondent complies with Rule 211(b),
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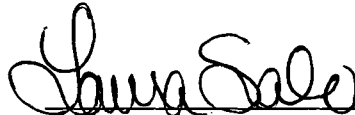
v.

Unihealth Post Acute Care Tanglewood, Employer, and American Zurich Insurance Company,
Carrier, Respondents/Appellants.

PROOF OF SERVICE

I certify that I have served the **Appellant's Brief of Appellant/Respondent** and **Respondent's Brief of Appellant/Respondent** upon the Respondents by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on **February 1, 2013**, addressed as follows:

Daniel Addison, Esquire
Hedrick, Gardner, Kinchloe & Garofalo, LLP
P.O. Box 11267
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Laura Sabo, Paralegal

Columbia, South Carolina

February 1, 2013

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