

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
South Carolina Workers' Compensation Full Commission

R. Michael Campbell, Commissioner; T. Scott Beck, Commissioner; Susan S. Barden,  
Commissioner

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W.C.C. File No.: 1401730  
Appellate Case No.: 2018-001553

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**RECEIVED**  
JUL 10 2019  
SC Court of Appeals

Carl E. Lucas, Employee, Respondent,

v.

RNDC of South Carolina, Employer, and Hartford Indemnity, Carrier, Appellants.

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**PROOF OF SERVICE**

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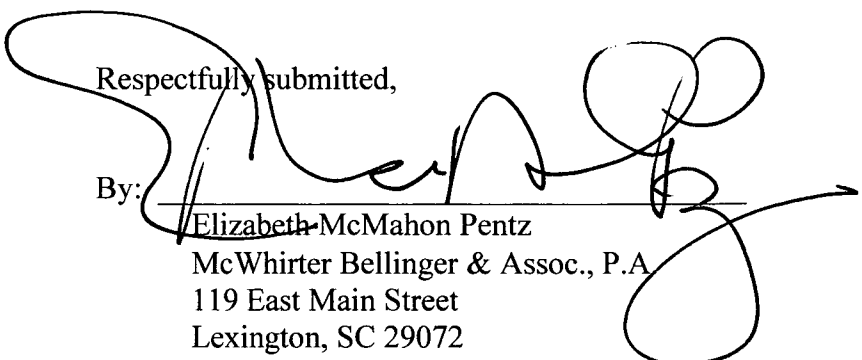
Counsel for the Respondent certifies that on July 10, 2019, she served the Respondent's **APPENDIX TO RECORD ON APPEAL** by depositing one (1) copy of the same pursuant to South Carolina Rule of Appellate Court 211 into the United States Postal Service with proper postage affixed on July 10, 2019, addressed as follows:

Kay G. Crowe, Esquire  
Barnes, Alford, Stork & Johnson, LLP  
P.O. Box 8448  
Columbia, South Carolina 29202  
Attorney for Appellants, RNDC of South Carolina and Hartford Indemnity

**[SIGNATURE PAGE FOLLOWS]**

Respectfully submitted,

By:



Elizabeth McMahan Pentz

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Attorney for Respondent, Carl E. Lucas

**APPENDIX TO RECORD ON APPEAL**

Lexington, South Carolina  
July 10, 2019

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AMANDA N. PITTMAN  
CHRISTOPHER M. CUNNINGHAM  
MADELYN E. DUKES  
ASHLEIGH ANNE McKINNEY

July 10, 2019

**VIA HAND DELIVERY:**

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

RECEIVED  
JUL 10 2019  
SC Court of Appeals

RE: Carl E. Lucas, Employee, Respondent, v. RNDC of South Carolina, Employer,  
and Hartford Indemnity, Carrier, Appellants.  
Appellate Case No.: 2018-001553

Dear Ms. Kitchings:

Pursuant to S.C. Appellate Court Rule 212, enclosed is a supplemental record. Further, pursuant to S.C. Appellate Court Rules 210(b) and 212(b)(c) is one (1) unbound copy and fourteen (14) bound copies of Respondent's **APPENDIX TO THE RECORD ON APPEAL** with **CERTIFICATE OF COUNSEL** filed on behalf of the Respondent, Carl E. Lucas; and **PROOF OF SERVICE** that one (1) copy was served on opposing counsel. Finally, enclosed is Kay G. Crowe's, Attorney for Appellants, May 8, 2019, correspondence in which she stated no objection to this submission. Please accept this for filing and kindly return two (2) clocked copies to our office.

Thanking you in advance, I am

Respectfully yours,

  
Elizabeth McMahon Pentz, Attorney for the Respondent

cc: Kay G. Crowe, Esquire  
Barnes, Alford, Stork & Johnson, LLP  
PO Box 8448  
Columbia, South Carolina 29202  
Attorney for Appellants, RNDC of South Carolina and Hartford Indemnity

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† CERTIFIED SPECIALIST  
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(1917-1995)  
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(1930-2008)

May 8, 2019

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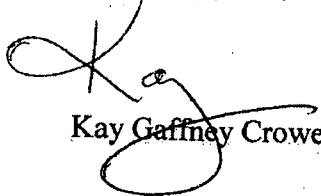
Re: Carl E. Lucas, Employee, Respondent, v RNDC of South Carolina,  
Employer, and Hartford Indemnity, Carrier, Appellants  
Appellate Case No.: 2018-001553

Dear Liz:

I am writing in response to your April 24, 2019 letter to the Court of Appeals in the above-named matter. To the extent any materials were inadvertently omitted from the Record on Appeal, as are noted in your Final Brief, I have no objection to you submitting an Appendix to the Record on Appeal, pursuant to Rule 212, SCACR. I would request that you provide me with a copy of any such submission.

With best regards, I am

Very truly yours,



Kay Gaffney Crowe

KGC/djr  
Enclosure

cc: Gina G. Schoen (w/encl.)

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