

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS COMPENSATION COMMISSION

WCC NO. 1423018  
(Appellate Case No. 2019-000897)


Giles Long, Claimant, ..... Appellant/Respondent  
v.  
Metro Construction, Inc., Employer, and American Zurich Ins. Co., and The SC Uninsured  
Employers' Fund, Carrier, ..... Defendants  
of which Metro Construction, Inc., Employer, and The SC Uninsured Employers' Fund,  
Carrier, are ..... Respondents/Appellants  
And American Zurich Ins. Co. is the ..... Respondent.

**DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL OF  
APPELLANT METRO CONSTRUCTION, INC.**

The Appellant Metro Construction proposes the following be included in the Record on Appeal:

1. Order of the Single Commissioner.
2. Order of the Full Commission.
3. Transcript of the Single Commissioner hearing.
4. American Zurich Ins. Co. policy (including premium audit tips).
5. July 4, 2014, policy cancellation.
6. July 5, 2014, audit letter to Metro.
7. October 23, 2014, audit letter to Metro.
8. November 3, 2014, Message Legend to Metro.
9. November 3, 2014, Premium Adjustment Notice.

**RECEIVED**  
AUG 29 2019  
SC Court of Appeals

  
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ATTORNEY FOR THE APPELLANT

August 28, 2019

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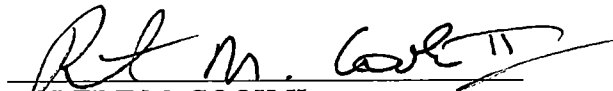
of which Metro Construction, Inc., Employer, and The SC Uninsured Employers' Fund,  
Carrier, are ..... Respondents/Appellants

And American Zurich Ins. Co. is the ..... Respondent

PROOF OF SERVICE

I certify that I have served the Appellant's Designation of Matter of Metro Construction, Inc. and the Appellant's Brief of Metro Construction, Inc. on the attorneys for the Respondents by depositing a copy of it in the United States Mail, first class postage prepaid, on August 28, 2019, addressed to Nicholas G. Callas, Esquire, 1901 Gadsden Street, Suite B, Columbia, SC 29201, the attorney for the Appellant, Giles Long, Timothy B. Killen, Esquire, 349 West Coleman Blvd., Suite 300, Mt. Pleasant, SC 29464, the attorney for the South Carolina Uninsured Employers' Fund and Lee E. Dixon, Esquire, P.O. Box 11267, Columbia, SC 29201, the attorney for American Zurich Insurance Co.

August 28, 2019



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August 28, 2019

The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

Re: Giles Long v. Metro Construction, Inc., et al.  
Appellate Case No.: 2019-000897

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Dear Ms. Abbott:

Enclosed please find the original and one copy each of the Appellant's Initial Brief and Designation of Matter of Metro Construction, Inc., with proof of service attached. Please file the originals of both documents and return the file-stamped extra copies to me. By means of a copy of this letter I am serving opposing counsel with both documents. Please call if there are any questions.

Very Truly Yours;



ROBERT M. COOK II  
The Robert Cook Law Firm, LLC

RMC:ppd

Enclosures: Appellant's Initial Brief of Metro Construction, Inc.  
Appellant's Designation of Matter of Metro Construction, Inc.  
Proof of Service

cc: Nicholas Callas, Esquire  
Lee E. Dixon, Esquire  
Timothy B. Killen, Esquire



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**The Honorable Jenny Abbott Kitchings**  
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