

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

AUG 19 2019

SC Court of Appeals

W.C.C. File No.: 1105628

Ex Parte: Christine Bradley, Surviving Spouse, Appellant,

v.

Southern Industrial Constructors, Inc., Employer,
and Zurich American Insurance Company
c/o Zurich North America, Carrier, Respondents.

**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents propose the following be included in the Record on Appeal:

1. Full Commission Decision & Order, filed July 26, 2018;
2. Hearing Commissioner Decision & Order, filed Jan. 22, 2018;
3. Order Appointing Guardian ad Litem, served June 8, 2011;
4. Motion to Compel Guardian ad Litem to Consent to Execute Medical Treatment Release Forms, filed Nov. 23, 2011, with attachment;
5. Administrative Order, served Dec. 7, 2011;
6. Motion to Compel Guardian ad Litem to Cooperate with the Administration of Causally Related Medical Treatment, filed Feb. 8, 2012;
7. Decision & Order, filed April 6, 2012;
8. (Motion to Remove Guardian ad Litem and Request for Commission Appointment of Guardian ad Litem, filed March 23, 2012, with Exh. A, 4-page Chronological Index of Medical Treatment;
9. Decision & Order, filed Aug. 16, 2012;

10. Order Relieving Counsel, filed Sept. 28, 2012;
11. Letter from J. Lockhart to Commissioner Beck, dated Oct. 18, 2012;
12. Decision & Order, filed Feb. 11, 2013;
13. Decision & Order, filed Oct. 10, 2013;
14. Form 50, dated Aug. 14, 2014;
15. Defendants' Form 58 Pre-Hearing Brief, dated Sept. 29, 2014;
16. Form 30, dated Feb. 24, 2015;
17. Form 31 Briefing Schedule & Notice of Appellate Hearing, served March 16, 2015;
18. Administrative Order, served June 10, 2015;
19. Amended Decision & Order, filed June 5, 2015;
20. Order, filed Aug. 21, 2015;
21. GAL Form 58, dated Nov. 20, 2015, with 17-page attachment;
22. Decision & Order, filed Dec. 18, 2015;
23. Letter from Gary M. Cannon to Mrs. Christine Bradley, dated Aug. 23, 2016;
24. Defendants' Form 58, Pre-Hearing Brief, filed Sept. 1, 2017, with APA attachments, pp. 1-41;
25. Form 21, filed June 13, 2017;
26. Order, served Sept. 14, 2017;
27. Letter from Mrs. Bradley to Commissioner T. Scott Beck, dated Dec. 7, 2017;
28. Form 30 Request for Commission Review, filed Feb. 2, 2018, with attachment;
29. Appellant Christine Bradley's Brief, dated April 11, 2018;
30. Respondents' Brief, dated April 20, 2018;
31. Notice of Dec. 7, 2015 Hearing, dated Nov. 6, 2015;
32. Notice of July 18, 2012 Hearing, served May 22, 2012;

33. Notice of Jan. 25, 2013 Hearing, served Dec. 7, 2012;
34. Notice of Hearing scheduled for Sept. 13, 2017, served on Mrs. Bradley, Derwin Bradley, Lavare Seltun and Christy James on July 3, 2017;
35. Order, served Sept. 14, 2017;
36. Notice of Hearing scheduled for Dec. 6, 2017, served on Mrs. Bradley, Derwin Bradley, Lavare Seltun and Christy James on Oct. 18, 2017;
37. Letter from Mrs. Bradley to Commissioner Beck, dated July 27, 2015;
38. Letter from Mrs. Bradley to Commissioner Beck, dated June 9, 2015;
39. Copies of checks for attendant care and wheelchair accessible van sent by Mrs. Bradley to the Commission, with hand-written note dated June 13, 2015 and June 18, 2015;
40. Transcript of Hearing, held before Commissioner Beck on July 18, 2012; and,
41. Transcript of Hearing, held before Commissioner Beck on Dec. 6, 2017.

I certify that this designation contains no matter that is irrelevant to this appeal.

August 14, 2019

McANGUS GOUDELOCK & COURIE LLC



Helen F. Hiser, S.C. Bar No.: 76124
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(843) 576-2900

*Attorneys for Respondents Southern Industrial
Constructors, Inc., Employer, and Zurich American
Insurance Company c/o Zurich North America,
Carrier*

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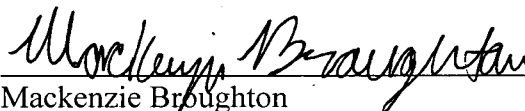
v.

Southern Industrial Constructors, Inc., Employer,
and Zurich American Insurance Company
c/o Zurich North America, Carrier, Respondents.

PROOF OF SERVICE

I certify that on the 14th day of August 2019, I served the **Initial Brief of Respondents** and Respondents' **Designation of Matter** on Christine Bradley by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

Christine Bradley
475 Lower Lee School Rd.
Mayesville, South Carolina 29104



Mackenzie Broughton
Legal Assistant to Helen F. Hiser
McAngus, Goudelock & Courie LLC
735 Johnnie Dodds Blvd., Suite 200
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Mount Pleasant, South Carolina 29465
(843) 576-2900

Attorneys for Respondents Southern Industrial Constructors, Inc., Employer, and Zurich American Insurance Company c/o Zurich North America, Carrier

Reply To

HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

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VIA U.S. MAIL

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

RE: Albert Bradley v. Southern Industrial Constructors and Zurich American
Insurance Company c/o Zurich North America
Date of Accident: May 16, 2011
WCC File No.: 1105628
Our File No.: 20216.11055
Claim No.: 2800074691
Appeal No.: 2018-001535

Dear Ms. Kitchings:

Enclosed for filing please find the following documents:

1. the original and one copy of the Initial Brief of Respondents;
2. the original and one copy of Respondents' Designation of Matter to be Included in the Record on Appeal; and
3. the original and one copy of Respondents' Proof of Service concerning items one and two.

Please file these documents and return the clocked-in copies in the enclosed, self-addressed stamped envelope.

If you have any questions, please do not hesitate to contact me.

Yours truly,



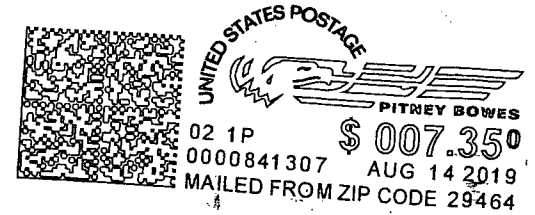
Helen F. Hiser

Attachments

cc: Christine Bradley, *Pro Se*

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