

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)

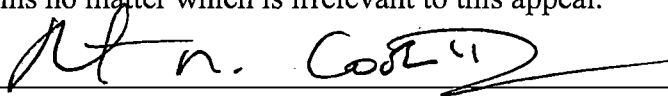
Giles Long, Claimant,Appellant/Respondent
v.
Metro Construction, Inc., Employer, and American Zurich Ins. Co., and The SC Uninsured
Employers' Fund, Carrier, Defendants
of which Metro Construction, Inc., Employer, and The SC Uninsured Employers' Fund,
Carrier, are Respondents/Appellants
And American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

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

The Respondent Metro Construction proposes the following be included in the Record on
Appeal, in addition to that proposed by the Appellant:

1. South Carolina Secretary of State Information (APA page 916)
2. Workers' compensation application (APA pages 791-794)
3. Coverage binder (APA pages 799-801)
4. 2013 and 2014 W-2s (APA pages 819-820)

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



ROBERT M. COOK II
The Robert Cook Law Firm, LLC
P.O. Box 3575
Leesville, South Carolina 29070
(803) 317-2171 (phone)
(803) 317-2175 (fax)
robcook1965@yahoo.com

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SEP 27 2019

SC Court of Appeals

September 26, 2019

ATTORNEY FOR THE RESPONDENT METRO
CONSTRUCTION, INC.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Employers' Fund, Carrier, Defendants

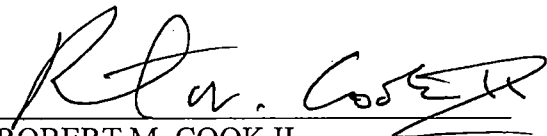
of which Metro Construction, Inc., Employer, and The SC Uninsured Employers' Fund,
Carrier, are Respondents/Appellants

And American Zurich Ins. Co. is the Respondent

PROOF OF SERVICE

I certify that I have served the Respondent's Designation of Matter of Metro Construction, Inc. and the Respondent's Brief of Metro Construction, Inc. on the attorneys for the parties 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 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.

September 26, 2019



ROBERT M. COOK II
The Robert Cook Law Firm, LLC
P.O. Box 3575
Batesburg-Leesville, South Carolina 29070
803-317-2171
ATTORNEY FOR THE RESPONDENT
METRO CONSTRUCTION, INC.

The Robert Cook Law Firm, LLC

P.O. BOX 3575
BATESBURG-LEESVILLE, SOUTH CAROLINA 29070
(803) 317-2171
robcook1965@yahoo.com

September 26, 2019

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

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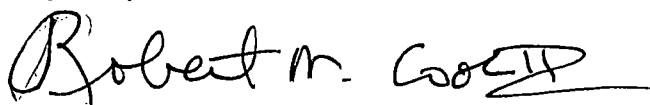
SC Court of Appeals

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

Dear Ms. Abbott:

Enclosed please find the original and one copy each of the Respondent'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: Respondent's Initial Brief of Metro Construction, Inc.
Respondent'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 Robert Cook Law Firm, LLC
 P.O. BOX 3575
 BATESBURG-LEESVILLE, SOUTH CAROLINA
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