

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

The Honorable T. Scott Beck, Commissioner

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W.C.C. File No. 1112328  
Appellate Case No. 2019-001357

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**RECEIVED**  
OCT 14 2019  
SC Court of Appeals

Samuel Rose,  
Claimant.....Respondent,

v.

JJS Trucking, LLC, Uninsured Employer, and Chris Thompson  
Services, Upstream Employer, and Bridgefield Casualty Ins. Co.,  
Carrier for Chris Thompson Services, and The State Accident  
Fund,.....Appellants.

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

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The Appellants, Chris Thompson Services and Bridgefield Casualty, propose the following to be included in the Record on Appeal:

1. Petition to Transfer Liability dated January 24, 2012;
2. Transcript of 3/15/12 hearing;
3. Order of Commissioner McCaskill dated 8/23/12;
4. Order of the Appellate Panel dated 5/15/13;
5. Form 21 dated 6/13/13;

6. Appellants' Form 58 dated 9/13/13;
7. Appellants' APA submissions from the 9/23/13 hearing (42 pages);
8. Claimant's Form 58 dated 8/5/13;
9. Transcript of 9/23/13 hearing;
10. Appellants' Motion to Introduce Newly Discovered Evidence dated 11/12/13 (with attachments);
11. Administrative Orders (3) dated 1/3/14;
12. Order of Commissioner Taylor dated 9/2/14;
13. Claimant's Form 30 dated 9/11/14 (with attachments);
14. Claimant's Brief to the Appellate Panel dated 11/14/14;
15. Appellants' Brief to the Appellate Panel dated 12/8/14;
16. Order of the Court of Appeals dated January 28, 2015;
17. Order of Appellate Panel dated 4/21/15;
18. Claimant's Letter to Court of Appeals dated 3/8/16 (with attachments);
19. Claimant's Brief to Court of Appeals dated 5/31/16;
20. Appellants' Brief to Court of Appeals dated 11/28/16;
21. Order of the Court of Appeals dated 4/8/18;
22. Remittitur dated 7/5/18;
23. Administrative Order dated 7/16/18;
24. Notice of 5/8/19 Hearing (dated 4/16/19);
25. E-mail correspondence (*re*: conference call) from Commissioner Taylor dated 4/23/19;
26. Notice of Hearing Postponement dated 4/29/19;

27. E-mail correspondence (*re*: continuance granted) from Commissioner Taylor dated 4/29/19;
28. Appellate Panel Order dated 6/17/19;
29. Appellants' Motion to Reconsider 6/17/19 Order dated June 21 2019;
30. Appellate Panel Order dated 6/24/19;
31. Appellants' Motion to Reconsider 6/24/19 Order dated June 24, 2019 and
32. Appellate Panel Order (denying Motion to Reconsider) dated July 15, 2019.

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

October 10, 2019



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Services, Upstream Employer, and Bridgefield Casualty Ins. Co.,  
Carrier for Chris Thompson Services, and The State Accident  
Fund,.....Appellants.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that the Initial Brief of the Appellants and Designation of Matter was served on Samuel A. Rose, the South Carolina Uninsured Employers Fund, and JJS Trucking, Inc. by depositing a copy of the same in the United States Mail, first class postage prepaid, on October 10, 2019, addressed to the legal representatives of the parties of record as follows:

Stephen B. Samuels, Esq.  
1320 Richland Street  
Columbia, SC 29201

Amy V. Cofield, Esq.  
P.O. Box 210039  
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October 10, 2019

*Kirsten Leslie Barr*

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TRASK  
HOWELL  
WORKERS' COMPENSATION DEFENSE

Reply to  
Kirsten L. Barr  
(843) 881-1027  
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October 10, 2019

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

RECEIVED  
OCT 14 2019  
SC Court of Appeals

Re: Samuel A. Rose v. JJS Trucking, LLC/SCUEF and Chris Thompson  
Services, LLC/Bridgefield Casualty Insurance Company  
W.C.C. File No.: 1112328  
**Appellate No.:** 2019-001357  
Carrier File No.: 0196-943450  
Date of Accident: August 10, 2011

Dear Ms. Kitchings:

Enclosed herewith for filing, please find the Initial Brief of the Appellants and Designation of Matter, with accompanying Proof of Service, in the above-referenced matter. By copy of this letter, I am serving the other counsel of record with a copy of these documents. If you should have any questions, please do not hesitate to contact me.

Yours very truly,

*Kirsten L. Barr*

Kirsten L. Barr

KLB/cab/les  
Enc.

cc: Kiema Lewis, Summit Holdings (w/enc.) (email only-claim faxes)  
Chris Thompson, Chris Thompson Services, LLC (w/enc.)  
Susan Mack Summit Holdings (w/enc.) (email only)  
Mike Jalovec, Summit Holdings (w/enc.) (email only)  
Stephen B. Samuels, Esq. (w/enc.)  
Amy V. Cofield, Esq. (w/enc.)  
Lisa Glover, Esq. (w/enc.)  
Timothy B. Killen, Esq. (w/enc.)  
Cedric Smalls, JJS Trucking (w/enc.)

