

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Gene McCaskill; Melody L. James; R. Michael Campbell, II
Workers' Compensation Commissioners

WCC File 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.

**RESPONDENT'S DESIGNATION OF MATTERS
TO BE INCLUDED IN RECORD ON APPEAL**

Lee E Dixon
Hedrick, Gardner, Kincheloe & Garofalo, L.L.P.
P.O. Box 11267
Columbia, SC 29211
(803) 727-1200
Attorney for Respondent American Zurich Ins. Co.

December 2, 2018

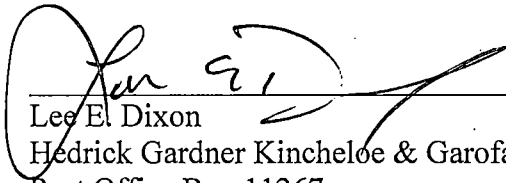
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DEC 02 2019
SC Court of Appeals

Pursuant to Rule 209, SCACR, the Respondent, American Zurich Insurance Company proposes that the following materials be included in the Record on Appeal before the Court of Appeals:

1. Matters designated by Claimant, Appellant/Respondent, on August 28, 2019
2. Matters designated by Respondent/Appellant, Metro Construction on September 26, 2019
3. Matters designated by Respondent/Appellant, SCUEF on August 28, 2019

I hereby certify that this Designation contains no matter which is irrelevant to the appeal.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lee El Dixon", is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping tail.

Lee El Dixon
Hedrick Gardner Kincheloe & Garofalo, LLP
Post Office Box 11267
Columbia, South Carolina 29211
(803) 727-1200
Attorney for Respondent American Zurich Ins. Co.

December 2, 2019

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Of which Metro Construction, Inc., Employer, and The SC Uninsured Employers' Fund, Carrier
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and American Zurich Ins. Co. is the Respondent.

PROOF OF SERVICE

This is to certify that a copy of the foregoing **Respondent's Initial Brief** and
Designation of Matter to be Included in the Record on Appeal has been served upon the
flowing by placing the same in the United States mail, first class postage pre-paid, addressed as
shown below on the 2nd day of December, 2019.

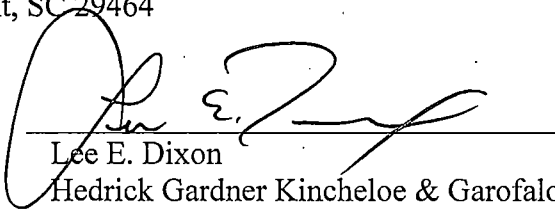
South Carolina Workers' Compensation Commission
Attn: Amy Bracy, Judicial Director
P.O. Box 1715
Columbia, South Carolina 29202

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SC Court of Appeals

Nicholas G. Callas
Nicholas G. Callas, P.A.
1901 Gadsden Street, Suite B
Columbia, South Carolina 29201

Robert C. Cook
The Robert Cook Law Firm, LLC
128 North Oak Street
Batesburg, SC 29006

Timothy B. Killen
Holder Padgett Littlejohn & Prickett, LLC
349 West Coleman Blvd. Suite 300
Mt. Pleasant, SC 29464

A handwritten signature in black ink, appearing to read "Lee E. Dixon", is written over a horizontal line. The signature is stylized and cursive.

Lee E. Dixon
Hedrick Gardner Kincheloe & Garofalo
Post Office Box 11267
Columbia, South Carolina 29211
(803) 727-1200
Attorney for Respondent American Zurich



HEDRICK GARDNER

HEDRICK GARDNER KINCHELOE & GAROFALO LLP

ATTORNEYS AT LAW

CHARLOTTE • RALEIGH • WILMINGTON • COLUMBIA

December 2, 2019

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

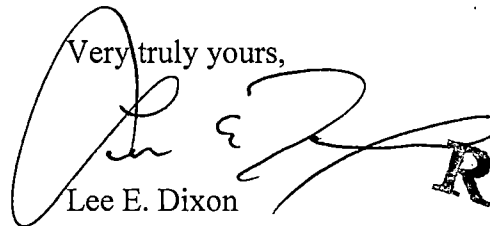
Reply To:
Lee E. Dixon
Special Counsel
1230 Main Street, Suite 325
Columbia, SC 29201
Direct: 803-727-1215
Fax: 803-727-1259
Email: ldixon@hedrickgardner.com

RE: Long, Gregg v. Metro Construction, Inc.
WCC File No.: 1423018
Appellate Case No.: 2019-000897
Claim No.: E5V6745
Our File: 00082L.00536

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy each of the Initial Brief of Respondent American Zurich, Designation of Matter, and Proof of Service. Please file the originals and return the file-stamped copies to me. By copy of this letter, with attachments, I am hereby serving all counsel of record with these documents.

Very truly yours,



Lee E. Dixon

LED/led

Cc: Nicholas G. Callas
Robert C. Cook
Timothy B. Killen
S.C. Workers Compensation Commission

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