

The State of South Carolina
In The Court of Appeals

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May 06 2020

SC Court of Appeals

Appeal from the South Carolina
Workers' Compensation Commission

T. Scott Beck, Commissioner
Avery B. Wilkerson, Jr. Commissioner
Gene McCaskill, Commissioner

WCC No.: 1706639

Jorge Lopez-Celestin.....Appellant,

v.

Reeves Young, LLC,
Holder Construction Group,
Amerisure Insurance Company,
&
American Zurich Insurance Company.....Defendants,

Of whom
Reeves Young, LLC,
&
Amerisure Insurance Company are..... Respondents.

Notice of Appeal

Jorge Lopez-Celestin, through his attorney of record, C. Daniel Vega, appeals the order of the Appellate of the South Carolina Workers' Compensation Commission dated April 7, 2020.

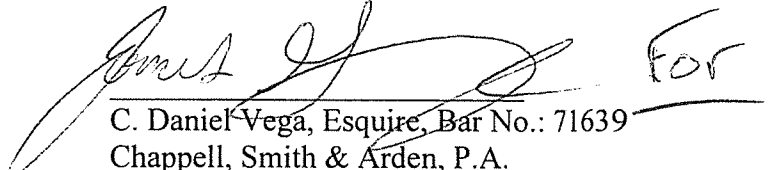
Pursuant to S.C. Code Ann. section 42-17-60, Appellant hereby petitions this Court for review based on the following grounds for appeal and alleged errors of law:

1. Whether the S.C. Workers' Compensation Commission erred in excluding deposition testimony of officers, directors and managing agents of the adverse party.
2. Whether the S.C. Workers' Compensation Commission erred in denying claimant's workers' compensation benefits under the "going and coming" rule, when the

evidence of record demonstrates claimant's injury by accident meets the exception to the rule.

3. Whether the S.C. Workers' Compensation Commission erred as a matter of law in denying claimant workers' compensation benefits under the "going and coming" rule.

May 6, 2020



C. Daniel Vega, Esquire, Bar No.: 71639

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**Attorney for Jorge Lopez-Celestin
Appellant**

Other Counsel of Record:

Jason A. Griggs

Willson, Jones, Carter & Baxley

872 South Pleasantburg Drive,
Greenville, South Carolina 29607

PH: (864) 527-3288

jagriggs@wjlaw.net

**Attorney for Reeves Young, LLC & Amerisure Insurance Company
Respondents**

W. James Flynn

Goodman McGuffey, LLP

7 Technology Circle, Suite 460

Columbia, South Carolina 29203

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**Attorney for Holder Construction Group & American Zurich Insurance Company
Defendants**

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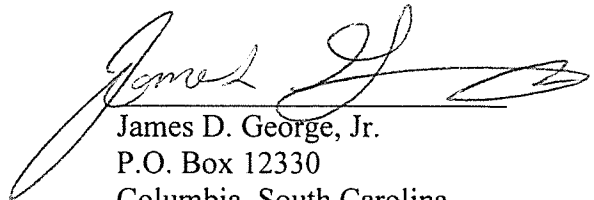
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Proof of Service

I certify that I have served the Notice of Appeal on Holder Construction Group and American Zurich Insurance Company, Defendants, by depositing a copy of it in the United States Mail, postage pre-paid on May 6, 2020, addressed to their respective attorneys of record, W. James Flynn, Goodman McGuffey, LLP, 7 Technology Circle, Suite 460, Columbia, South Carolina 29203



James D. George, Jr.
P.O. Box 12330
Columbia, South Carolina
(803) 929-3600

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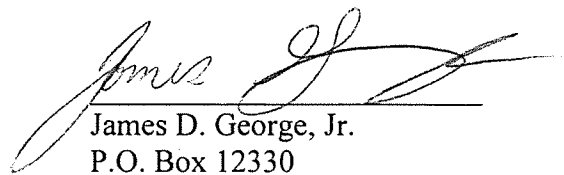
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Proof of Service

I certify that I have served the Notice of Appeal on Reeves Young, LLC, and Amerisure Insurance Company, Respondents, by depositing a copy of it in the United States Mail, postage pre-paid on May 6, 2020, addressed to their respective attorneys of record, Jason A. Griggs, Willson, Jones, Carter & Baxley, 872 South Pleasantburg Drive, Greenville, South Carolina 29607.



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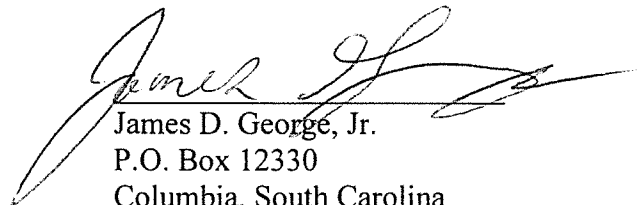
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Proof of Service

I certify that I have served the Notice of Appeal on the South Carolina Workers' Compensation Commission by depositing a copy of it in the United States Mail, postage pre-paid on May 6, 2020, addressed to Amy Bracy, Judicial Director, South Carolina Workers' Compensation Commission, 1333 Main St. # 500, Columbia, South Carolina 29201.



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May 6, 2020



Licensed to practice
in South Carolina,
North Carolina
and Georgia.

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SC Court of Appeals

Via facsimile (27 pages) and U.S. Mail
The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Jorge Lopez-Celestin, Appellant v. Reeves Young, LLC, et. al. Respondents
WCC File No. 1706639

Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal to the Court of Appeals. Also enclosed are the following:

- (1) Proof of services of the Notice of Appeal on the various respondents.
- (2) Proof of service of the Notice of Appeal on the Workers' Compensation Commission
- (3) A filing fee of \$250.00- **Via U.S. Mail only**
- (4) A copy of the order that is be challenged on appeal.

Sincerely,

C. Daniel Vega
P.O. Box 12330
Columbia, South Carolina 29211
(803) 929-3600

cc: Jason A. Griggs
Willson, Jones, Carter & Baxley
872 South Pleasantburg Drive,
Greenville, South Carolina 29607

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Goodman McGuffy, LLP
7 Technology Circle, Suite 460
Columbia, South Carolina 29203