

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No. 2019-001254  
WCC File No. 1506114

**RECEIVED**

**May 04 2020**

**SC Court of Appeals**

Frankie Padgett, Claimant. . . . . Respondent,

v.

Cast and Crew Entertainment Services, Inc., Employer,  
and American Zurich Insurance Company, Carrier, . . . . . Appellants.

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

Respondent proposes the following be included in the Record on Appeal:

1. Form 12A dated May 6, 2015
2. Form 15 dated June 2, 2015
3. Form 12A dated August 27, 2009
4. Claimant's APA Submissions pages 10-72
5. Claimant's Exhibits pages 73-83
6. Claimant's motion to submit additional evidence with attached subpoena and response from Cast & Crew
7. Transcript of hearing, dated November 27, 2018, pages 30-37
8. Transcript of hearing, dated October 30, 2017 (entire transcript)

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

Respectfully Submitted,



Stephen B. Samuels  
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May 4, 2020  
Columbia, South Carolina

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Frankie Padgett.....Claimant/Respondent,

v.

Cast & Crew Entertainment Services, Inc. and American Zurich Insurance  
Company c/o Zurich North America.....Carrier/Appellants.

**PROOF OF SERVICE**

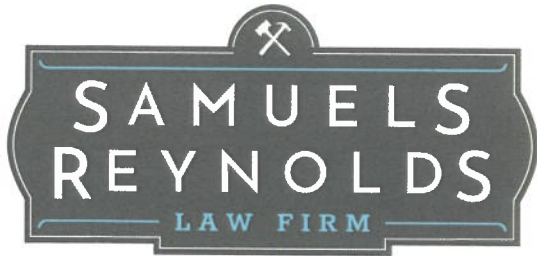
I certify that I, Wanda Powell, paralegal for the Samuels Reynolds Law Firm, LLC, have served the **Initial Brief of Respondent, Designation of Matter and Respondent's Return to Motion to Perfect Appeal** upon counsel for the Appellants via electronic service on May 4, 2020 addressed as follows:

Vernon Dunbar, Esquire  
McAngus Goudelock & Courie, LLC  
55 East Camperdown Way  
Suite 300  
Greenville, SC 29601  
*(Via email: [vernon.dunbar@mgclaw.com](mailto:vernon.dunbar@mgclaw.com))*

May 4, 2020



Wanda Powell, Paralegal  
SAMUELS REYNOLDS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

May 4, 2020

*Via email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)*  
The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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**May 04 2020**  
**SC Court of Appeals**

RE: Frankie Padgett v. Cast & Crew Entertainment Services, Inc. and American Zurich Insurance Company c/o Zurich North America  
Appellate Case No. 2019-001254

Dear Ms. Kitchings:

Attached for filing please find the **Initial Brief of Respondent, Designation of Matter, Respondent's Return to Motion to Perfect Appeal and Proof of Service** in the above case.

By copy of this letter, I am hereby serving Vernon F. Dunbar, counsel for the Appellants, of same.

Respectfully,

A handwritten signature in blue ink, appearing to read "SBS", is written over a horizontal line.

Stephen B. Samuels

Attachment(s) as stated

cc: Vernon F. Dunbar, Esquire (Via email: [vernon.dunbar@mgclaw.com](mailto:vernon.dunbar@mgclaw.com))

SBS/wp

WE WORK FOR THE PEOPLE WHO WORK

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