

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.

RETURN TO MOTION TO PERFECT APPEAL

Respondent hereby files his Return to Appellants' Motion to Perfect Appeal.

Appellants filed a Motion requesting "that the Court permit it to proceed with perfecting its appeal absent Respondent's Brief."

The Court previously granted an extension to Respondent to file his brief on or before April 13, 2020. On March 20, 2020, the South Carolina Supreme Court issued an order on *Operation of the Appellate Courts During the Coronavirus Emergency*. The Order provided "the due dates for all Appellate Court filings due on or after the effective date of this order are hereby extended for twenty (20) days." Appellate Case No. 2020-000447 (March 20, 2020).

The additional twenty days provided by the emergency Order extend the due date for Respondents's Initial Brief and Designation of Matter to May 3, 2020. As May 3rd is a Sunday, the actual due date is May 4, 2020.

Respondent filed his Brief and designation on this date. As such, his filing is timely. Therefore, the Motion to Perfect Appeal should be denied.

Respectfully Submitted,



Stephen B. Samuels
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stephen@samuelsreynolds.com

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

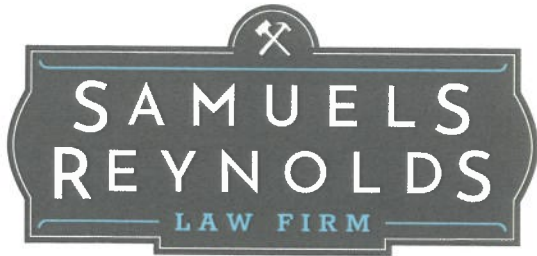
I certify that I, Wanda Powell, paralegal for the Samuels Reynolds Law Firm, LLC, have served the **Initial Brief of Respondent, Designation of Matter and Respondent's Return to Motion to Perfect Appeal** upon counsel for the Appellants via electronic service on May 4, 2020 addressed as follows:

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

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
The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED
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)

SBS/wp

WE WORK FOR THE PEOPLE WHO WORK

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