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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
JUN 19 2020  
SC Court of Appeals

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

WCC FILE NO. 1320600

Kevin M. Todd, .....Employee/Claimant,

VS.

Michael Roberts d/b/a Michael Roberts Home Repair,.....Employer/Respondent,  
and S.C. Uninsured Employers' Fund, .....Appellant,

NOTICE OF APPEAL

The Appellant, S.C. Uninsured Employers' Fund appeals the Decision and Order of the Appellate Panel of the South Carolina Workers' Compensation Commission filed May 18, 2020 and received by Appellant on May 20, 2020. The grounds for appeal are as follows.

1. The Full Commission Appellate Panel erred in finding the Claimant, Kevin M. Todd suffered a compensable injury by accident arising out of and in the course and scope of his Employment with Michael Roberts Home Repair.
2. The Full Commission Appellate Panel erred in finding that Mike Roberts Home Repair regularly employed four or more persons at the time of the Claimant's accident, subjecting that business to the jurisdiction of the Workers' Compensation Commission.
3. The Full Commission Appellant Panel erred in awarding benefits in this case as the accident did not arise out of or in the scope of the Claimant's Employment and because the Commission lacked jurisdiction over this claim.
4. The Full Commission Appellant Panel erred in considering this matter at conference rather than allowing Appellant arguments. The panel also erred in admitting additional evidence from the Claimant without the consent of the Employer who appeared Pro se.



Samuel T. Brunson( S.C. Bar No. 9907)  
Brunson Law Firm  
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(843) 669-8111 (phone)  
(843)375-8810 (facsimile)  
Attorney for Appellant,

June 16, 2020  
Florence, SC

Other Counsel of Record:

Gene Connell, Esquire  
(S.C. Bar No. 1358)  
Kelaher, Connell & Connor, P.A.  
The Courtyard Suite 209  
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Post Office Drawer 14547  
Surfside Beach, South Carolina 29587-4547  
843-238-5648  
**Attorney for Respondent, Kevin M. Todd**

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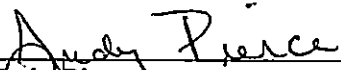
PROOF OF SERVICE

I, Judy Pierce, Secretary to Samuel T. Brunson do hereby certify that I have served the  
Notice of Appeal on the following by depositing a copy of it in the United States Mail, postage  
prepaid, on June 16, 2020, addressed to each:

Gene Connell, Jr., Esquire  
Kelaher Connell & Conner, P.C.  
P.O. Drawer 14547  
Surfside Beach, SC 29587

Mike Roberts, D/b/a  
Mike Roberts Home Repair  
3334 New Road  
Conway, SC 29526

Amy Bracy  
Judicial Director  
S.C. Workers' Compensation Commission  
PO Box 1715  
Columbia, SC 29202-1715

  
\_\_\_\_\_  
Judy Pierce  
Secretary to Samuel T. Brunson  
Attorney at Law  
Post Office Drawer 431  
Florence, South Carolina 29503  
(843) 669-8111

June 16, 2020  
Florence, South Carolina

# BRUNSON LAW FIRM

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**SAMUEL T. BRUNSON**  
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June 16, 2020

The Honorable Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Kevin M. Todd vs. Mike Roberts d/b/a Mike Roberts Home Repair  
SCWCC NO: 1320600 UEF NO: 2013-4474  
Our File: 1580

Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal in the above-captioned case. Also enclosed are the following:

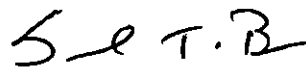
1. Proof of Service of the Notice of Appeal on the Respondents.
2. Copy of the Order which is to be challenged on Appeal.
3. Our check for the \$250.00 filing fee.

Please return a clocked copy to us in the self-addressed, stamped envelope provided.

By copy of this letter, I hereby serve the Respondents and the South Carolina Workers' Compensation Commission with the Notice of Appeal.

Thank you for your kind assistance in this matter.

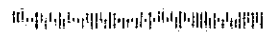
Sincerely yours,



Samuel T. Brunson

STB/jjp  
Enclosures

CC: Amy Bracy, Judicial Director, S.C. Workers' Compensation Commission  
Gene Connell, Esq. Attorney for Respondent  
Mike Roberts, d/b/a/ Mike Roberts Home Repair



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