

RECEIVED**Jul 31 2020****SC Court of Appeals**

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2020-000351

Gene Grady, Employee, Respondent,

v.

The Shaw Group, Employer, and Zurich American Insurance Company, Carrier,
Appellants.

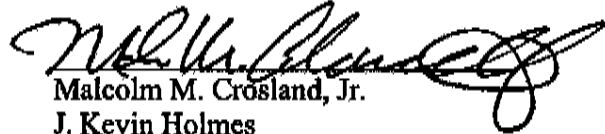
**RESPONDENT'S SECOND AMENDED ADDITIONAL DESIGNATION
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent requests the following additional matter be included in the Record on Appeal:

1. Consent Order dated June 17, 2015;
2. Consent Order dated March 21, 2016;
3. Form 21 dated June 21, 2016;
4. Form 22 dated August 11, 2016;
5. Consent Order dated June 1, 2018;
6. Form 50 dated January 29, 2018;
7. Form 51 dated February 28, 2018
8. Form 21 dated April 27, 2018;
9. Form 22 dated May 4, 2018;
10. Respondent's Supplemental Form 58 and APA Submissions dated June 29, 2018;
11. Notice of Appeal dated February 24, 2020.

The undersigned certifies that this second amended designation of matter contains no matter that is irrelevant to this appeal.

Respectfully Submitted,



Malcolm M. Crosland, Jr.

J. Kevin Holmes

THE STEINBERG LAW FIRM, L.L.P.

61 Broad Street

P.O. Box 9

Charleston, SC 29402

(843)720-2800

Attorneys for the Respondent

Charleston, South Carolina
July 30, 2020

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**The Shaw Group, Employer, and Zurich American Insurance Company, Carrier,
Appellants.**

CERTIFICATE OF SERVICE

The undersigned certifies that he served the Joint Motion to Amend the Parties' Designations of Matter to be Included in the Record on Appeal and Appellants' Amended Designation of Matter to be Included in the Record on Appeal by depositing a copy of same via U.S. mail, postage prepaid, addressed to:

Malcolm M. Crosland, Jr.
J. Kevin Holmes
The Steinberg Law Firm, LLP
P.O. Box 9
Charleston, SC 29402

The undersigned further accepts service of Respondent's Second Amended Designation of Additional Matter to be Included in the Record on Appeal.



William F. Childers, Jr.
ELLER TONNSEN BACH, LLC
1306 South Church Street
Greenville, SC 29605
Phone: (864) 236-5013
Fax: (864) 312-4191

Attorney for Appellants

July 30, 2020
31
WFC



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Greenville, SC 29605
Telephone (864) 236-5013
Facsimile (864) 312-4191

July 31, 2020

VIA FACSIMILE (803) 734-1839

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

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SC Court of Appeals

*Re: Gene Grady v. The Shaw Group, Inc. and Zurich American Insurance Co.
Appellate Case No. 2020-000351*

Dear Ms. Kitchings:

Enclosed please find the following:

1. Joint Motion to Amend the Parties' Designation of Matter;
2. Appellant's Amended Designation of Matter;
3. Respondent's Second Amended Designation of Matter;
4. Certificate of Service.

I will send you the \$50.00 check for the filing fee associated with this Motion by U.S. Mail today. I appreciate your consideration. Please do not hesitate to contact me with any additional questions or concerns.

With kind regards,

ELLER TONNSEN BACH, LLC

William F. Childers, Jr.

WFC

Enclosures

Page 2 of 2

cc: Malcolm Crosland, Jr. (via U.S. mail)
J. Kevin Holmes (via U.S. mail)



ELLER TONNSEN BACH
Attorneys at Law

1306 South Church Street • Greenville, South Carolina, 29605

Date: *July 31, 2020*

Deliver To: *The Honorable Jenny Abbott Kitchings*

Firm/Company: *SC Court of Appeals*

Phone:

Fax: *(803) 734-1839*

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SC Court of Appeals

From: *Katharine Mitchell on behalf of William Childers, Jr.*

Phone: *(864) 312-4176 (direct line)*

Fax: *(864) 312-4191*

Total Pages Including Cover: 11

Fax

Urgent	Reply ASAP	Please Comment	Please Review	For Your Information
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Re: *Gene Grady v. The Shaw Group, Inc. and Zurich American Insurance Co.*
Appellate Case No. 2020-000351

Please see the attached documents to be filed in the above matter. As indicated, we will be mailing the attached documents with the \$50 filing fee. Thank you.

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