

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Oct 21 2020

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

SC Court of Appeals

Appeal No.: 2018-001535

Ex Parte: Christine Bradley, Surviving Spouse, Appellant.

In re: Albert Bradley, Employee,

v.

Southern Industrial Constructors, Inc., Employer,
and Zurich American Insurance Company

c/o Zurich North America, Carrier,..... Respondents.

**RESPONDENTS' RESPONSE TO APPELLANT'S
MOTION TO REQUEST LEGAL REPRESENTATION**

Pursuant to Rules 210 and 240, SCACR, Respondents Southern Industrial Constructors, Inc. and Zurich American Insurance Company c/o Zurich North America hereby respond to Appellant's Motion to Request Legal Representation. After yet another extension of time, rather than comply with this Court's Orders requiring her to file the Record on Appeal, Appellant now "requests legal representation for the filing of the record on appeal." Appellant has not indicated that she has engaged counsel or even that she is attempting to engage counsel. It appears that she believes this Court should appoint legal counsel to assist her in preparing the Record on Appeal. There is no provision in the South Carolina Appellate Court Rules for such an appointment.

As Respondents have pointed out previously, this appeal has been pending before this Court since August 2018. Due to delays and repeated failures on the part of

Appellant to comply with Appellate Court Rules, this appeal has not progressed past the initial briefing stage. In other words, in nearly 26 months, Appellant has filed her Initial Brief and various versions of a purported Designation of Matter, and Respondents have filed their Initial Brief and Designation of Matter, but the appeal has progressed no farther due to Appellant's repeated failures to comply with this Court's appellate rules. To the extent Appellant is seeking and intends to engage legal counsel in order to prepare and serve the Record on Appeal in a timely manner, Respondents have no objection. However, to the extent Appellant is seeking to have this Court appoint legal counsel to assist her and/or to the extent this is merely another delay, Respondents object and request this Court to take appropriate action including, but not limited to, dismissing this appeal.

This motion conforms with Rules 240 and Rule 267, SCACR.

McANGUS GOUDELOCK & COURIE, LLC



October 21, 2020

Helen F. Hiser, S.C. Bar No.: 76124
P.O. Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

Attorneys for Respondents Southern Industrial Constructors, Inc., Employer, and Zurich American Insurance Company c/o Zurich North America, Carrier

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PROOF OF SERVICE

I certify that on the 21st day of October 2020, I served the **Respondents' Response to Appellant's Motion to Request Legal Representation** on Christine Bradley by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

Christine Bradley
475 Lower Lee School Rd.
Mayesville, South Carolina 29104

/s/Lisa Carducci
Lisa Carducci
Legal Assistant to Helen F. Hiser
McAngus, Goudelock & Courie LLC
735 Johnnie Dodds Blvd., Suite 200
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Mount Pleasant, South Carolina 29465
(843) 576-2900

*Attorneys for Respondents Southern
Industrial Constructors, Inc., Employer, and
Zurich American Insurance Company c/o
Zurich North America, Carrier*



Reply To

HELEN F. HISER
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helen.hiser@mgclaw.com

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SC Court of Appeals

VIA FACSIMILE & U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Albert Bradley v. Southern Industrial Constructors and Zurich American
Insurance Company c/o Zurich North America
Date of Accident: May 16, 2011
WCC File No.: 1105628
Our File No.: 20216.11055
Claim No.: 2800074691
Appeal No.: 2018-001535

Dear Ms. Kitchings:

Enclosed please find Respondents' Response to Appellant's Motion to Request
Legal Representation, along with the Proof of Service in the above-referenced matter.

If you have any questions, please do not hesitate to contact me.

Yours truly,

Helen F. Hiser

Attachments

cc: Christine Bradley, *Pro Se*, via U.S. Mail