

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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SC Court of Appeals

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

WCC FILE NO. 1320600

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

vs.

Mike Roberts d/b/a Mike Roberts Home Repair, Employer  
and S.C. Uninsured Employers' Fund, Carrier/Defendants

OF WHICH

S.C. Uninsured Employers Fund is the ..... Appellant

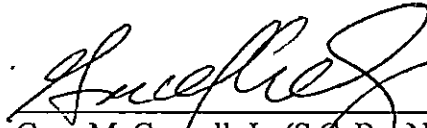
**DESIGNATION OF MATTER TO BE  
INCLUDED IN RECORD ON APPEAL**

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

1. Decision and Order of Appellate Panel - May 18, 2020
2. Transcript of Hearing - September 25, 2014
3. Order of Commissioner McCaskill - March 30, 2015
4. Appellate Panel Decision and Order - January 12, 2016
5. S.C. Court of Appeals Opinion filed May 23, 2018
6. Motion to Transfer to Full Commission September 12, 2019
7. Notice of Deposition of Flom - September 17, 2019
8. Deposition of Flom - September 20, 2019
9. Interim Order of Commissioner Beck - September 27, 2019
10. Judicial Conference Order of Commissioner Beck - October 21, 2019
11. Letter to Judicial Department November 13, 2019 forwarding Deposition of Flom
12. WCC Request for Order and Decision – February 20, 2020

**We certify that this designation contains no matter which is irrelevant to this appeal**

KELAHER, CONNELL & CONNOR, P.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)  
The Courtyard, Suite 209  
1500 U. S. Highway 17 North  
Post Office Drawer 14547  
Surfside Beach, South Carolina 29587-4547  
(843) 238-5648 (phone)  
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[gconnell@classactlaw.net](mailto:gconnell@classactlaw.net)  
**Attorney for Respondent**

November 9, 2020  
Surfside Beach, South Carolina

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OF WHICH

S.C. Uninsured Employers Fund is the..... Appellant

**PROOF OF SERVICE**

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of **Respondent's Designation of Matter to be Included in Record on Appeal**, on the 9<sup>th</sup> day of November, 2020, by depositing a copy of same in the United States Mail, postage prepaid, to:

Samuel T. Brunson, Esquire.  
Brunson Law Firm  
P.O. Box 431  
Florence, SC 29503

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

*Shelia Y. McCumbee*  
Shelia Y. McCumbee

**SWORN AND SUBSCRIBED** before me,  
this 9<sup>th</sup> day of November, 2020.

Donna H. Hand  
Notary Public for South Carolina  
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

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238-5648

FAX: 238-5050

EDWARD T. KELAHER\*  
GENE M. CONNELL, JR.  
L. SIDNEY CONNOR, IV  
LISA POE DAVIS  
\*OF COUNSEL

November 9, 2020

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

Re: Appellate Case No. 2020-000923  
*Kevin M. Todd v. Mike Roberts d/b/a Mike Roberts Home Repair and  
S.C. Uninsured Employers' Fund*  
W.C.C. File No. 1320600  
Our File No. 2014-0046C

Dear Ms. Kitchings:

Enclosed please find the following for filing in the above-captioned matter:

- (1) Original and one copy of Initial Brief of Respondent, with Proof of Service;
- (2) Original and one copy of Respondent's Designation of Matter to be Included in Record on Appeal, with Proof of Service.

Please be so kind as to return a filed copy of the Proof of Service of each document in the self-addressed, stamped envelope provided for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on Appellant through counsel of record and on Mike Roberts d/b/a Mike Roberts Home Repair.

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr:sm  
Enclosures

cc w/enc.: Samuel T. Brunson, Esquire.  
Mike Roberts d/b/a Mike Roberts Home Repair

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KELAHER CONNELL & CONNOR, P.C.  
Attorneys at Law  
P. O. Drawer 14547  
Surfside Beach, SC 29587-4547

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