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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appeal No. 2019-001361

Courtney Ray Mitchell, Employee,Appellant,

v.

United Parcel Service, Employer, and
Liberty Mutual, Carrier, Respondents.

MOTION FOR CORRECTION OF CAPTION

Pursuant to Rule 240, SCACR, Respondents United Parcel Service and Liberty Mutual hereby move this Court to order that the caption of this appeal be corrected so that the name of employer United Parcel Service's insurance carrier, Liberty Mutual, is properly reflected. There is no "Liberty Corporation" involved in this appeal. Both Respondents and the Commission have routinely referred to the carrier involved as Liberty Mutual. (See R. pp. 6, 66, 91). Accordingly, the caption should read:

Courtney Ray Mitchell, Employee,Appellant,

v.

United Parcel Service, Employer, and
Liberty Mutual, Carrier, Respondents.

Respondents further request that the printed and bound Final Briefs in this appeal not be due until the caption of this appeal has been corrected.

Respectfully submitted,

MCANGUS GOUDELCK & COURIE



March 31, 2021

Helen F. Hiser
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(843) 576-2900

*Attorneys for Respondents United Parcel
Service and Liberty Mutual*

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APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

SC Court of Appeals

W.C.C. File No.: 1322347

Courtney Ray Mitchell, Employee,Appellant,

v.

United Parcel Service, Employer, and
Liberty Mutual, Carrier, Respondents.

PROOF OF SERVICE

I certify that on the 31st day of March 2021, I served the Respondents' **Motion for Correction of Caption** on Courtney Ray Mitchell by emailing it and placing a copy of it in the United States Mail, postage prepaid, addressed to his attorney of record as follows:

Donald L. Smith, Esq.
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*Counsel for Appellant
Courtney Ray Mitchel*

s/Haylee Mitchell
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Reply To
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March 31, 2021

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SC Court of Appeals

Via S.C. Courts e-Filing and U.S. Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: Courtney Ray Mitchell v. UPS and Liberty Mutual
Date of Accident: June 21, 2013
WCC File No.: 1322347
Our File No.: 2095.15004
Claim No.: WC555C6285
Appeal No.: 2019-001361

Dear Ms. Kitchings:

Enclosed please find Respondents' Motion for Correction of Caption, along with the Proof of Service, in the above-referenced matter. Also enclosed is our firm's check in the amount of \$50 for filing the motion.

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

Sincerely,
McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Donald L. Smith, Esq. (via email and U.S. Mail)

McANGUS GOUDELCK & COURIE LLC

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The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
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