

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 30 2021

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

SC Court of Appeals

South Carolina Workers' Compensation Claim No. 1819776

South Carolina Uninsured Employers Fund,Appellant

v.

Jeff Quinn, Yeamans Hall Club/Accident Fund Insurance Co. of America,
Travelers Property Casualty Co. of America, and Michael Hannaway d/b/a
Hannaway PaintingRespondents

NOTICE OF APPEAL

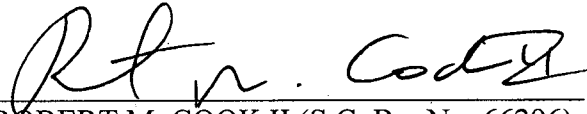
The South Carolina Uninsured Employers Fund appeals the Decision and Order of the Appellate Panel of the South Carolina Workers' Compensation Commission dated June 1, 2021, and electronically served upon counsel for the South Carolina Uninsured Employers Fund on that same date. A copy of the Decision and Order is attached. Pursuant to South Carolina Code Section 42-17-60 the South Carolina Uninsured Employers Fund states the following grounds for appeal:

1. The Commission erred in failing to find and hold that Yeamans Hall Club was the statutory employer of the claimant and that Yeamans Hall Club (and its carrier) was responsible for this claim rather than the South Carolina Uninsured Employers Fund.
2. The Commission erred in finding and holding that the South Carolina Uninsured Employers Fund was bound by the Commission's order dated 7/25/19 and could not contest the issue of coverage as to Travelers Property Casualty Co. of America as a result.
3. The Commission erred in failing to find and hold that Travelers Property Casualty Co. of America improperly cancelled its coverage and that the South Carolina Uninsured Employers Fund was responsible for this claim.

The Appellant reserves, to the fullest extent permissible, the right to reword and reorder the above stated grounds for appeal in its initial briefs and to address the complete array of factual

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findings and conclusions of law by the Commission under and within the umbrella of the above stated grounds for appeal.



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UNINSURED EMPLOYERS FUND

June 30, 2021

Other Counsel of Record:

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(Attorney for Jeff Quinn)

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2655 Midland Park Road
Charleston, SC 29406
(Not represented by an Attorney)

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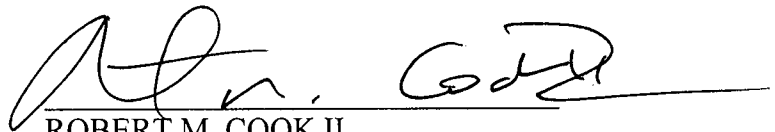
v.

Jeff Quinn, Yeamans Hall Club/Accident Fund Insurance Co. of America,
Travelers Property Casualty Co. of America, and Michael Hannaway d/b/a
Hannaway PaintingRespondents

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on the attorney for Jeff Quinn by depositing a copy of it in the United States Mail, postage prepaid, on June 30, 2021, addressed to David Pearlman, Esquire, 61 Broad Street, Charleston, SC 29401, the attorney for Yeamans Hall Club/Accident Fund Insurance Co. of America, Anne V. Noonan, Esquire, 421 Wando Park Blvd., Suite 100, Mt. Pleasant, SC 29464, the attorney for Travelers Property Casualty Co. of America, Phillip S. Ferderigos, Esquire, P.O. Drawer H, Charleston, SC 29402, Michael Hannaway d/b/a Hannaway Painting, 2655 Midland Park Road, Charleston, SC 29406 and the SCWCC, Judicial Department, P.O. Box 1715, Columbia, SC 29201.

June 30, 2021



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SC Court of Appeals

June 30, 2021

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

**Re: South Carolina Uninsured Employers Fund v. Jeff Quinn, Yeamans Hall Club/Accident Fund Insurance Co. of America, Travelers Property Casualty Co. of America and Michael Hannaway d/b/a Hannaway Painting
WCC No. 1819776**

Dear Ms. Abbott:

I represent the South Carolina Uninsured Employers Fund in the matter referenced above. Enclosed please find the original and a copy of a Notice of Appeal concerning this matter, with proof of service attached. By means of a copy of this letter, we are taking the liberty of serving this Notice of Appeal on opposing counsel as well as informing opposing counsel of this communication with the court. It is our understanding that a fee is not needed because the South Carolina Uninsured Employers Fund is a state agency.

Please call me if you have any questions about this.

Yours Very Truly,



ROBERT M. COOK II
The Robert Cook Law Firm, LLC

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Enclosure: Original and copy of Notice of Appeal, with proof of service
Return envelope

cc: Anne V. Noonan, Esquire (w/enclosures)
Phillip S. Ferderigos, Esquire (w/enclosures)
David Pearlman, Esquire (w/enclosures)
Michael Hannaway d/b/a Hannaway Painting (w/enclosures)
SCWCC, Judicial Department (w/enclosure)