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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.: 2018-001526

Monica Murphy, Employee, ...Appellant,

v.

Halocarbon Products Corporation, Employer, and
Commerce & Industry Insurance Company
c/o AIG Claims, Inc., Carrier,..... Respondents.

RETURN IN OPPOSITION TO MOTION FOR COSTS

Respondents Hydrocarbon Products Corporation and Commerce & Industry Insurance Company c/o AIG Claims, Inc. hereby oppose Appellant Monica Murphy's Motion for Costs. Rule 222 provides, in pertinent part, that "[u]nless otherwise ordered by the appellate court … costs shall be taxed against the appellant when the appeal is dismissed or judgment is affirmed …. When an appeal is affirmed or reversed in part or is vacated, costs shall be allowed only as ordered by the appellate court." Rule 222(a), SCACR. Citing Rule 222(a) & (e),[1] the Supreme Court has held that, "it is within this Court's discretion whether to award fees and costs under Rule 222." *Austin v. Stokes-*

[1] Subsection (e) of Rule 222 provides that, "[i]f costs are taxed …" Rule 222(e), SCACR.

Craven Holding Corp., 406 S.C. 187, 199, 750 S.E.2d 78, 84 (2013). Thus, an award of appellate costs and fees is not automatic but, instead, is within the Court's discretion.

Here, the Court did not reach the substance of this claim but remanded to the Commission for consideration of an expert report Appellant submitted prior to the rescheduled hearing. Thus, Appellant has not prevailed on her claim, but only has partially prevailed to the extent the Commission has been ordered to consider the report of her expert, Dr. Edelman.

The vast majority of argument and documents submitted as part of the Record on Appeal address the substantive issues of Appellant's claim, whereas only a small portion of the above address the issue of the excluded expert report. Only six pages in Appellant's Brief and three pages in her Rely Brief address this issue. A small fraction of the voluminous Record on Appeal is devoted to this issue.

In the event this Court awards appellate costs, however, the amounts requested by Appellant should be reduced as follows:

1. Appellant seeks $893.84 as the cost of the court reporter's transcript. However, the transcript that is referenced in Rule 222(b)(2) refers to the transcript of the hearing from which the appealed order arose. In this case, that is the transcript of the Full Commission hearing, which Appellant ordered on August 22, 2018. (Exh. 1). That transcript is 24 pages long, (Exh. 2), not 200 pages long. The Single Commissioner hearing transcript is 200 pages long; however, that transcript was ordered in the appeal to the Full Commission, and not for purposes of the appeal to this Court. As a result, to the extent costs are awarded, they

should be reduced to the appropriate amount that reflects the cost of ordering the transcript of the hearing before the Full Commission.

2. Reimbursement of the cost of printing the Record on Appeal and the Supplement to the Record requested by Appellant totals 10,726 pages. As noted above, only a small portion of the Record on Appeal addresses the issue actually ruled on and, in addition, Appellant designated voluminous amounts of the Commission record, even supplementing at the last minute, that were not necessary to a resolution of this appeal.

CONCLUSION

For the reasons stated herein, this Court should exercise its discretion and deny all of the requested appellate costs or, in the alternative, reduce them as outlined above.

Respectfully submitted,

McANGUS GOUDELOCK & COURIE, LLC

July 6, 2021

s/Helen F. Hiser

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Rick Hall
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August 22, 2018
Via U. S. Mail

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SC Court of Appeals

Amber Scarborough
Creel Court Reporting
1230 Richland Street
Columbia, SC 29201

Judicial Department
S.C. Workers' Compensation Commission
Post Office Box 1715
Columbia, SC 29202-1715

RE: Monica Murphy vs. Halocarbon Products Corporation and Commerce Industry Insurance Company, c/o AIG Claims, Inc.
WCC FILE NO.: 1511478

Dear Ms. Scarborough and S.C. Workers' Compensation Commission:

I am writing to request a copy of the transcript of the oral argument before the Appellate Panel of the South Carolina Workers' Compensation Commission on June 18, 2018 at 2:00 p.m. I look forward to receiving the transcript and an invoice as soon as conveniently possible.

Should you have any questions regarding this matter, please feel free to contact me at my Lexington office.

Yours truly,

Frederick I. Hall, III

FIH,III/gmt
cc: Clerk of Court, Court of Appeals
James H. Lichty, Esquire

EXHIBIT 1

THE RICK HALL LAW FIRM, LLC
RH

301 Gibson Road • P.O. Box 1898
Lexington, South Carolina 29071

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SC 290
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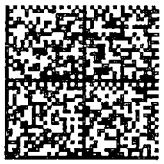

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The Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
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Columbia, South Carolina 29211

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SC Court of Appeals

29211-162929

Transcript of the Testimony of
MURPHY V. HALOCARBEN PRODUCTS, ET AL

Date: June 18, 2018

CREEL COURT REPORTING, INC.
Condensed Transcript and Word Index

1230 Richland Street
Columbia, SC 29201
Phone: (803) 252-3445 / (800) 822-0896
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EXHIBIT 2

STATE OF SOUTH CAROLINA
BEFORE THE
SOUTH CAROLINA WORKER' COMPENSATION COMMISSION
WCC No. 1511478

Monica Murphy,
Claimant,
v.
Halocarbon Products,
Employer,
and
Commerce & Industry,
Carrier/Defendants.

FULL COMMISSION HEARING

****

Monday, June 18, 2018
2:07 p.m. - 2:33 p.m.

The Full Commission Hearing was heard before Commissioner T. Aisha Taylor, Avery B. Wilkerson, Jr., and Michael Campbell, at the Workers' Compensation Commission, 1333 Main Street, Suite 500, Panel A, Columbia, South Carolina, on the 18th day of June, 2018, before Amber Scarborough, Court Reporter and Notary Public in and for the State of South Carolina.

APPEARANCES

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EXHIBITS

(There were no exhibits marked during the hearing.)

STIPULATIONS

It is stipulated and agreed that this deposition is being taken pursuant to the Administrative Procedures Act and the South Carolina Rules of Civil Procedure.

CALL TO ORDER:

COURT REPORTER: Today is June 18th, 2018. This is South Carolina's, South Carolina Workers' Compensation Case Number 1511478. This is the case of Monica Murphy, Plaintiff versus Halocarbon Products, Employer and Commerce and Industry, Carrier. The Appellant is the Claimant represented by Frederick Ivy Hall, III. The Respondent is represented by James H. Lichty. Each side is allowed ten minutes for oral argument and the Appellant three minutes in reply. You are requested to argue the grounds of exception and stay within the record.

COMMISSIONER TAYLOR: All right. Mr. Hall.

POSITION STATEMENT - MR. HALL:

MR. HALL: May it please the Commission. This case is a medically complex case. It comes to you on Appeal from Commissioner Barden's Order denying that the Claimant suffered a compensable injury and at least with respect to her heart and lungs, at least an injury in this case that was anything less than a brief exposure. I want to get right to the heart of it because I've got limited time. I -- I

really want to address first the issue of whether or not I should have been allowed or the Claimant should have been allowed to submit rebuttal evidence. The case law says I should have been able to and I don't think Commissioner Barden properly interrupted the law on that and, you know -- so there's two, there are two facets to this particular argument one of which is that, you know, I moved for additional time to do discovery in this case because I was served with three new expert opinions that had not been given to me and my mother was in the hospital and it was an Emergency Motion that was filed and the Rule's pretty clear that good cause includes an emergency number one, number two it includes additional discovery. I've been practicing law 36 years and I can tell you that to be served three new expert opinions in a medically complex case and to be denied the right to explore their opinions and to decide whether or not you need rebuttal evidence is fundamentally unfair to deny that. Fifteen -- this hearing was reset for April the 27th and exactly 15 days prior to that deadline I served as a -- as

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the regulation permits a supplemental expert report from a very prominent, highly qualified physician, an expert in the field of chemical exposures including hydrofluoric acid. He was highly qualified and he was offered in rebuttal to an expert in this case who's opinion I had not been given -- and I -- I'm not going to belabor. This case has been extensively briefed and I think it's been well briefed by both sides and so the Commission can get a full flavor for it if it looks at these briefs. But I think one of the pertinent regulations, in addition to the fact that I served it timely and 15 days prior to the rescheduled hearing, which is what the regulation requires, it was also sufficient to supplement the earlier brief that I had filed in this case. In the regulation 67 -- and -- and there's a case that's specifically on point, Fore versus Griffco of Wampee, the citation is in the brief, it says Regulation 67-611 they were expressly imposing a deadline for filing and serving the pre-hearing brief also requires, it requires parties to supplement their responses when warranted. This regulation however does

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not impose a deadline for disclosure of new information when that information is provided in an effort to amend a prior response. That's exactly what happened in this case. And so I think it's fundamentally unfair and I believe it's a manifest legal error for Commissioner Barden not to have admitted that evidence in such a crucially complex case. But, moreover, I really want to get to the heart of the matter. You know, the legal area is what it is, but this case should be reversed because the facts require it. This is not a case where the Commissioner's view of it was that it's simply a different battle of the experts, that's just not true. This is not a battle of the experts because the fact of the matter is, in this particular case, two of the defense experts, who I did not -- one of them I got an opportunity to depose, the other one which I did not, Dr. Early, admit in their reports -- and this is in the record. I can find it for you if you want, but you'll -- you'll see it, it's there, it's all there. This was not a minimal exposure. This was not a minimal exposure. Lonnie Parsons was one of the

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witnesses who testified that he was out working up on a mezzanine above where this leak occurred. The other witness in this case, George Campbell, said when he confronted this chemical that was billowing out, according to the testimony of Monica Murphy, it nearly took his breath away. Now, to suggest that the exposure, which Ms. Murphy somehow had, was de minimis is not right and it fly's in the face of the Defendant's scientific evidence in this case. This says even a minimal exposure can cause delayed and sig- -- and a whole range of health effects. This is not a small case. This lady came to the brink of death and she -- when she was evaluated about eight days later, she went first to Urgent MD and I -- I think I said it was Augusta it's Aiken, it's actually North Augusta, so let me correct the record on that -- she went and just a few days later went in and they say she has a normal cardiovascular exam. Well, that's just absolutely false. That's absolutely false. She requested an EKG in this case and it was interrupted by her front line treating cardiologist, Kellie Lane, as third degree heart block. And Dr. Lane

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testified under oath she should have never left Urgent MD that day and -- and that's -- in fact it was read as a chronic abnormality. That's just absolutely false. It was third degree heart block and she had to have a pacemaker put in. Now, I want the Commissioners, respectfully, to look very carefully at what the SDS sheet says in this case, the Safety Data Sheet. You all are very familiar with these documents and -- and how they read. Pure and liquid anhydrous HF, Hydrofluoric Acid, copiously fumes when exposed to the atmosphere and it's normal boiling point is only 67 degrees as the mixtures containing more than about 50 percent. And Ms. Murphy testified that this -- the -- these fumes were billowing. This -- they can see that there were fumes. They can see that there were fumes. So, even if you concede that there was not a lot of fumes, in which case I argue that that's not true, and I'm gonna tell you why in conclusion in just a moment. Even a minimal exposure can cause serious and delayed health effects. Now, that's not the witnesses testifying. That's not Ms. Murphy testifying. Those are the

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scientific documents produced from the Defendants' files. Their own protocol says that she should have been taken in this case immediately to the hospital, and she was not. That's their own safety protocol that was revised in -- in 2015, I think, March, prior to this incident. And here's to -- here's the kicker. Here's the kicker that y'all need to leave with in this case and I'm gonna sit down for reply in a few moments. Both Dr. Early, their environmental guy, toxicologist, as well as Dr. McKinnon, their purported hydrofluoric acid expert, both notate in the reports that if there is a prolonged QT interval, cardio -- electrocardiogram, that that is specific evidence of a substantial exposure. That's exactly what she had. And her treating doctors found that in the hospital, Dr. Elgin Hobbs. There was a prolonged QT interval and he diagnosed toxic inhalation injury and you have to conclude on -- in the panoply of the record of a substantial reliable and probative evidence on the whole record that, in fact, what Dr. Soetero (sic), our cardiology expert, said and what Dr. McKinnon said, and what Dr.

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Early said, as well as Dr. Hobbs said, you have four doctors that know that she had a prolonged QT interval. All of which is evidence of a very significant exposure to hydrofluoric acid. That is not a matter of inference when you look at the substantial reliable and probative evidence on the whole record. The Commissioner has mishandled this evidence. And Dr. McKinnon was not provided with Ms. Murphy's deposition and he testified, whether it's true or not, I don't know, only he knows, he testified under oath that he wasn't given Dr. Hobbs' record. That he'd only been provided with some of the records. If this Commission is going to follow its longstanding practice of believing the testimony and the findings of treating doctors, you need go no further than Dr. Hobbs, who found that this lady had a prolonged QT interval and was diagnosed with a toxic inhalation injury, the equivalent of which included third degree heart block.

COMMISSIONER TAYLOR: Thank you, sir. You'll have three minutes for your rebuttal. And Mr. Lichty, if you will please address the -- the Motion issue and the evidence that was

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included.

POSITION STATEMENT - MR. LICHTY:

MR. LICHTY: Yes, Your Honor. May it please the Court, this matter was originally scheduled for hearing on March 7th and two hours prior to the hearing I received notice that Mr. Hall had a personal emergency in his family that required his attendance. Of course, his mother was in the hospital and the Commissioner graciously agreed to postpone the hearing so that he could tend to her. The Motion that was subsequently filed did mention additional discovery and the parties did discuss it with the Commissioner under a conference call, but I think it's pretty clear from what happened since then that the Motion -- or the Continuance was granted so that he could be with his mother. Not so that additional evidence could come into the record. I think that the best evidence of that is that the Commissioner refused to let the new evidence in. If she had postponed the hearing to allow Mr. Hall to get new evidence, why would she then not allow him to put that evidence on the record when we reconvened for the hearing? I think certainly the -- there's

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also somewhat of a misconstrue of the regulations. 67-611 deals with witnesses. Patricia Fore -- yeah, Patricia Fore was my case. It dealt with witnesses and if rebuttal evidence is to be accepted into the record, it's in the form of a de bene esse deposition or at the deposition testimony of a witness who can't make it at the hearing. The Regulations, and that's specifically 67-612, it doesn't say anywhere that rebuttal evidence can take the form of an expert's report, which was both solicited and prepared after the date of the original hearing. So, that would be my response in sum and -- and brief. But I'd like to get to the merits of this case by starting in a somewhat unusual place, and that's the reptile brain. I think a lot of us here have heard or seen parts of the reptile brain theory of prosecuting a claim, and I think that's what you'll find in this case. Now, what the reptile brain theory says, it focuses on the actions of the defendant and the harmful nature to trigger primitive ex- ---

MR. HALL: I object. That's outside of the record. There's -- there's nothing mentioned in the --

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about the reptile in this case.
COMMISSIONER TAYLOR: I ---
MR. HALL: And that's outside of the record.
COMMISSIONER TAYLOR: I sense this is a legal theory and I think it's appropriate for argument.
MR. LICHTY: But it's -- it's a legal theory that kind of tries and trigger the part in the human's brain that's been their evolutionary the longest. It's the fight or flight mechanism. And it focuses on the conduct of the defendant and it focuses on the -- the causative danger and it tries to entice juries subconsciously to render verdicts against defendants in order to protect their community. And I can see that being successful in front of the jury, but not in front of a group of professional Commissioners whose job it is to see through all of that and to look into the evidence of this case. I think if you look at the evidence in this case, it's absolutely clear that whatever exposure Ms. Murphy had at work was not significant enough to cause the injuries that she claims. Now, make no bones about it, the Defendants admit that HF can be a dangerous chemical with significant health

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risk, but I would submit that Tequila falls in that same category. That too much of it, over too long a period of time poses significant safety risks as well. It's all about how the material is handled. I think if you look at it -- this case objectively, what you'll find is that there wasn't enough there to cause these injuries. An exposure case like this depends a lot on the dose response mechanism, how much of the harmful chemical was -- was there, and how long a period of time was the exposure. I just want to set the stage of this exposure if you will. Imagine this room is the -- is the building that we're working in and that door leads to an outside semi-enclosed patio. Now, last night approximately where the elevators are, there was a pinhole leak that developed a pipe that carries 40 percent HF acid. Okay. The pipe had been drained, the insulation had been removed, so that the maintenance people could get to it. But there were still -- and the pipe was being vented into a carboy, which was located 25 feet away from the door. So, you got a situation where there were vapors present, but it's not 40 percent hydrofluoric

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acid, as has been suggested on a number of occasions here. Ms. Murphy, in the process of disposing of chemical waste, cracks the door open for a couple of seconds, is encountered by this harmful fume, closes the door. By her own account, she took three, no more than four breaths of this -- of this chemical. She was wearing full safety gear. She's developed an immediate reaction that was coughing. She went upstairs. Did she ask for a doctor? No. She talked to her supervisor, she sat down, she penned a nasty email to safety demanding a meeting with management. She was offered a chance to go to the doctor, she declined until the following day to go seek medical attention. She basically had the same response that you'd expect anyone to have that would have similar exposure. In fact, George Campbell, who I believe Mr. Hall referenced, had the same exposure. It took his breath away. This is a pungent chemical, but it's not harmful enough in the -- in the -- in the amounts that she encountered, which were documented as being trace amounts, being they were below measurable limits in the area where these vapors were.

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So, you get below measurable limits, you've got no more than three breaths over a period of less than half a minute. That was her exposure. And then nine days later, she's asking you to believe that this minimal exposure caused her to develop heart block and a pulmonary condition that's gonna exist for the rest of her life. I think what you'll see here -- the Claimant can't even carry her burden of proof. So, just forget about the evidence that Defendants submitted on this case. Just look at the evidence that Ms. Murphy submitted on her own behalf as it relates to the heart. She's got Dr. Lane, who is a cardiologist in the hospital that evaluates her and says, Claimant has questions about whether or not this can be caused by her exposure. She says there is no degree of HF exposure that can cause heart block unless there is an electrolyte imbalance. Electrolytes, of course, are chemicals that are in blood. HF affects that by removing calcium and phosphors in your body. It creates an electrolyte imbalance. They tested for that. Over the nine days between the exposure and the

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time she goes to the hospital, they tested it on at least three occasions. There were no electrolyte imbalances found. There was one reading of low potassium, but that reading was still within the reference range. Meaning it was on the low end of what would be expected from this report. So, Dr. Lane is saying the electrolytes did not suggest that this exposure caused it later. After Mrs. Murphy's attorney had talked to her for about 40 minutes, at her deposition, she says, well, you know, it wasn't the exposure, but, you know, Ms. Murphy has evasive -- and underlying vasovagal problem. And this is a problem that she knows, because twenty-something years ago when she was pregnant she passed out one time. Okay. Well, Ms. Murphy was exposed to the chemicals, she started coughing, this triggered an underlying vasovagal reflex, which caused her heart to stop. That was Kelley Lane's opinion of causation on this case. The Claimant's other experts basically said poppy cock. They said no way. Soetero (sic), who didn't look at the Claimant, reviewed her records, said this was due to HF exposure. And Dr. Aquilina, who was

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not an authorized doctor and who was the actual surgeon who put the pacemaker in, says I don't know what caused her heart block, but there's no way it was an underlying vasovagal reflex. Because what he can do now that she has a pacemaker, is he can interrogate it and see if she still has the problem, and she does. If this was a problem that was caused by an HF exposure, it would have gone away and the pacemaker would not be permanent, it would be a temporary thing. So, based on that evidence alone, that's without discussing any of the cardiologists or medical reports that Defendants admit. You've got both of Claimant's experts conflicting with one another. One saying it was a vasovagal reflex, but not HF exposure. One saying it wasn't vasovagal reflex, but it was HF exposure. If the Claimant's two experts are in conflict with one another, how in the world would they expect the Commission to rely on either one of them? So, that's -- that's -- that's the problem right there with the burden of proof. But even going beyond that, Defendants have proven in this case that it

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wasn't related because Dr. Early, who's a toxicologist, said it doesn't add up. She didn't have any electrolyte problems in between the time of the exposure. This is not something that were to come on gradually over a week. The symptoms would have been worse immediately after the exposure and gotten better, not good right after the exposure and gotten worse. Dr. Early, the toxicologist, says this. Dr. McKinnon, the doctor who literally who wrote the chapter in the book about HF exposures in the occupational setting, he said it wasn't HF exposure. Dr. Feldman, I believe, was the other expert we used, he said it wasn't HF exposure. So, we've got three experts giving medical opinions that the quantity and -- and time of her exposure did not cause her heart block. So, from that I'd respectfully say the Commissioner absolutely nailed it. Her heart problems are not related. There is also a pulmonary issue that was involved here. And I want to be respectful of time. The pulmonary issue is a little more straight forward. This woman previously worked for the Savannah River site, which meant that

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periodically she would have pulmonary function tests done, so we had a really good record of where her pulmonary function was even before this accident. We had several experts look at it. We had Dr. Mitchell, Dr. Early, and Dr. Spagenthal all look at these things and say, hey, you know, she's got these pulmonary issues, but they clearly preexisted her accident and we can tell that based on the record of her pulmonary function test dated from way back before this accident. The only expert that really said that the pulmonary issues were related to the accident were doctor -- was Dr. Lane. I know you all had Dr. Lane before -- and I want to stay within the record, but let's just say that Dr. Lane, of course, diagnosed her with RADS. RADS is a condition that is premised upon a obstructive airway deficit, which, if I'm not mistaken is breathing in. She doesn't have an obstructive deficit. If anything, she has a restrictive deficit, which is trying to breathe out. When confronted with this information, Dr. Lane just said, well, yeah, I'm just gonna base it on her history -- on her personal history that she

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said she encountered an occupational exposure, she's complaining of these symptoms, therefore I think she has it. The other doctors relied on objective evidence. That being said, that's all I have. We rest of our position on the matter.

COMMISSIONER TAYLOR: Thank you.

MR. LICHTY: In closing, we would urge the Commission to uphold the Commissioner's finding that this claim is not compensable.

COMMISSIONER TAYLOR: Thank you, sir.

MR. LICHTY: Thank you.

COMMISSIONER TAYLOR: Mr. Hall. You have three minutes.

REPLY - MR. HALL:

MR. HALL: If it please the Commission, first of all, Dr. Lane, in her deposition, missed the fact -- and I -- I don't fault doctors for being busy. There was an electrolyte imbalance. So, that's absolutely not false. That -- it means absolutely false there was no electrolyte imbalance. And Dr. Early missed that point. He said he looked for it. Well, it's in the record. And I don't need to direct y'all there. It's in the briefs. Specifically

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cited where her phosphoreus was low. And there was no mention of the fact that it was just relatively low. He gave -- they had to give her phosphoreus because she was in there. The other thing is -- is that -- just go back to Dr. McKinnon, who admits that if this stuff was billowing, that that is significant in that it would have been greater than 40. We don't concede for a moment that there was trace. That's nothing but a self-serving incident report written by Halocarbon after the thing got out. The cow was out of the barn. There was no measurement taken. So, the evidence at best is in conflict, but the substantial reliable probative evidence indicates that it was billowing and it was a significant exposure. You should rely on the testimony of George Campbell, whose testimony is more consistent and more reliable with a significant exposure if it was sufficient to take his breath away. It's not just pungent. He began coughing. Finally, I would ask you to go back and look at this diagnosis by Dr. Elgin Hobbs, who's an internist slash cardiologist in the hospital who noted this significant prolonged

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QT interval. All of the doctors in this case agree that there was no -- this lady had no significant chronic abnormality. If she had, she'd be running to the doctors all the time. There was a report filed in -- in -- and taken at Urgent MD in North Augusta for her yearly physical before she had to go to work or return to work with Halocarbon that said she had a normal heart exam at that time. If it's -- if it was so chronic and so serious, why didn't it pick up? So, the -- the evidence is substantial here that she was exposed to a very, very serious exposure. And, again, in conclusion, go look at the four doctors -- Dr. Soetero (sic), Dr. Hodge -- Dr. Hobbs, who is a treating doctor, even Dr. McKinnon and Dr. Early, all say that, in fact, that is evidence of prolonged QT interval -- objective testing. He referred to objective testing on an echocardiogram or electrocardiogram as objective evidence of a very significant exposure. And what I would say, too, about the -- briefly ---

COMMISSIONER TAYLOR: Mr. Hall, finish your thought. Go ahead. Please finish your thought.

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MR. HALL: Briefly, Dr. Early, their own toxicologist, says her lungs were worse off. There is evidence in the record at -- taken at the hospital, this is in treating -- front line treating medical evidence that said that there is evidence of the -- of destructive disease because she had a positive response to a broncho dialator and their own expert, Dr. Mitchell, conceded to that. Thank you.

COMMISSIONER TAYLOR: All right. Thank you, sir. All right. That concludes this matter. Thank you.

(There being nothing further, the full commission hearing concluded at 2:33 p.m.)

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appeal No.: 2018-001526

Monica Murphy, Employee, ...Appellant,

v.

Halocarbon Products Corporation, Employer, and
Commerce & Industry Insurance Company
c/o AIG Claims, Inc., Carrier,..... Respondents.

PROOF OF SERVICE

I certify that on the 6th day of July 2021, I served the **Respondents' Return in Opposition to Motion for Costs** on Monica Murphy by emailing a copy and depositing a copy of it in the United States Mail, postage prepaid, addressed to her attorney of record:

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rick@sctrialattorneys.com

s/Helen F. Hiser
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Attorneys for Respondents Halocarbon Products Corporation and Commerce & Industry Insurance Company c/o AIG Claims, Inc.

Reply To
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July 6, 2021

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SC Court of Appeals

Via S.C. Courts E-filing
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Monica Murphy v. Halocarbon Products Corporation and Commerce & Industry Insurance Company c/o AIG Claims, Inc.
Date of Accident: August 11, 2015
WCC File No.: 1511478
Our File No.: 2094.18147
Claim No.: 555-185578
Appeal No.: 2018-001526

Dear Ms. Kitchings:

Enclosed please find the original of Respondents' Return in Opposition to Motion for Costs, and the Proof of Service in the above-referenced matter. We are serving counsel of record via email and U.S. Mail.

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

Yours truly,

McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Frederick I. Hall, III, Esquire