

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

RECEIVED

Oct 28 2021

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

---

SC Court of Appeals

Appellate Case No.: 2021-000695  
South Carolina Workers' Compensation Claim No. 1819776

---

South Carolina Uninsured Employers Fund, ..... Appellant,

vs.

Jeff Quinn, Employee, Yeamans Hall Club, Employer, Accident Fund  
Insurance Co. of America, Carrier, Travelers Property Casualty Co. of  
America, Carrier, and Michael Hannaway d/b/a Hannaway Painting,  
Employer..... Respondents.

---

MOTION TO DISMISS RESPONDENT QUINN FROM APPEAL

---

Pursuant to Rule 240, SCACR, Respondent Quinn requests he be dismissed  
from making an appearance in this case based on the following grounds:

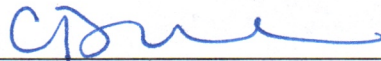
1. The findings of the Single Commissioner by Decision and Order dated June 29,  
2020, and the findings of the Full Commission by Decision and Order dated  
June 1, 2021, regarding compensability and Respondent Quinn's entitlement

to benefits were not appealed and are incorporated by reference and remain the findings of this case.

2. The issues set on appeal pertain solely to a dispute regarding which insurance carrier is responsible for the benefits previously awarded to Respondent Quinn by the Single Commissioner and affirmed by the Full Commission. Respondent Quinn has no position as to which carrier is responsible for the benefits awarded to him.
3. The parties have agreed that Respondent Quinn should be dismissed from making an appearance in this case and agree that he will not participate in the briefing or oral arguments in this case. (See Exhibit A, proposed Consent Order.)

WHEREFORE, based upon the grounds set forth above, Respondent Quinn respectfully requests this Honorable Court dismiss him from making an appearance in the appeal currently pending before this Court.

Respectfully Submitted,



---

David T. Pearlman  
Catherine D. Meehan  
Steinberg Law Firm, LLP  
Post Office Box 9  
Charleston, South Carolina 29402  
(843) 720-2800  
Attorneys for Respondent Jeff Quinn

**RECEIVED**

**Oct 25 2021**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

---

**APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION**

---

Appellate Case No.: 2021-000695  
South Carolina Workers' Compensation Claim No. 1819776

---

South Carolina Uninsured Employers Fund, ..... Appellant,

vs.

Jeff Quinn, Employee, Yeamans Hall Club, Employer, Accident Fund  
Insurance Co. of America, Carrier, Travelers Property Casualty Co. of  
America, Carrier, and Michael Hannaway d/b/a Hannaway Painting,  
Employer..... Respondents.

---

**CONSENT ORDER**

---

It now comes before this Honorable Court the parties have reached an agreement as detailed below and have requested this Court issue this Order memorializing the agreement. The parties have agreed as follows:

1. The findings of the Single Commissioner by Decision and Order, dated June 29, 2020, and the findings of the Full Commission by Decision and Order, dated

EXHIBIT A

June 1, 2021, with the exception of those specifically appealed to this Court, are not subject to appeal and are incorporated by reference and remain the findings of this case.

2. The Claimant/Respondent Jeff Quinn has no position and will be making no argument on this appeal as to insurance coverage.
3. As such, the parties have agreed that Claimant/Respondent Quinn is dismissed from making an appearance in this case and agree that he will not participate in the briefing or oral arguments in the case.

The above agreement has been entered into freely and voluntarily by all parties as evidenced by their signatures below.

NOW, THEREFORE, based upon the above, it is hereby

ORDERED, ADJUDGED, AND DECREED that the above Agreement be incorporated herein as an Order of the South Carolina Court of Appeals.

AND IT IS SO ORDERED!

---

FOR THE COURT

Columbia, South Carolina  
October \_\_\_\_\_, 2021

**RECEIVED**

**Oct 25 2021**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

---

**APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION**

---

Appellate Case No.: 2021-000695  
South Carolina Workers' Compensation Claim No. 1819776

---

South Carolina Uninsured Employers Fund, ..... Appellant,

vs.

Jeff Quinn, Employee, Yeamans Hall Club, Employer, Accident Fund  
Insurance Co. of America, Carrier, Travelers Property Casualty Co. of  
America, Carrier, and Michael Hannaway d/b/a Hannaway Painting,  
Employer..... Respondents.

---

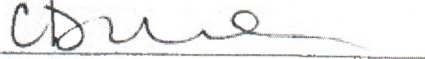
**PROOF OF SERVICE**

---

I certify that I have served the **Consent Order** by electronic mail on the Honorable Jenny Abbott Kitchings, Clerk of Court of the South Carolina Court of Appeals at ctappfilings@sccourts.org, Robert M. Cook, II, Esquire, attorney for Appellant South Carolina Uninsured Employers Fund at robcook1965@yahoo.com, Anne V. Noonan, Esquire, and J. Gabriel Coggiola, Esquire, attorneys for Respondents Yeamans Hall Club and Accident Fund Ins. Co. of America at avnoonan@wjlaw.net and jgcoggiola@wjlaw.net, Phillip S. Ferderigos, Esquire, attorney for Respondent Travelers Property and Casualty Co. of America at pferderigos@barnwell-whaley.com, and Respondent Michael Hannaway d/b/a Hannaway Painting at bluehog11@aol.com.

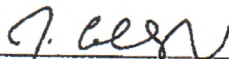
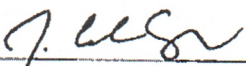
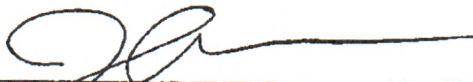
**[SIGNATURE BLOCK ON FOLLOWING PAGE]**

We Consent:



David T. Pearlman  
Catherine D. Meehan  
Steinberg Law Firm  
P.O. Box 9  
Charleston, SC 29402  
Attorneys for Respondent Jeff Quinn

Robert M. Cook, II  
PO Box 3575  
Batesburg-Leesville, SC 29070  
Attorney for Appellant SCUEF

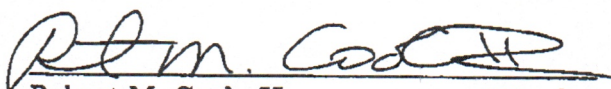
  
xw Anne V. Noonan  
Willson Jones Carter & Baxley  
4922 O'Hear Ave., Suite 301  
North Charleston, SC 29405  
Attorney for Respondents Yeamans Hall Club and Accident Fund Ins. Co. of America  
John Gabriel Coggiola  
Willson Jones Carter & Baxley  
3600 Forest Drive, Suite 204  
Columbia, SC 29204  
Attorney for Respondents Yeamans Hall Club and Accident Fund Ins. Co. of America  
Phillip G. Ferderigos John W. Fletcher  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, SC 29402  
Attorney for Respondent Travelers Property and Casualty Ins. Co. of America

Michael Hannaway d/b/a Hannaway Painting  
2655 Midland Park Road  
Charleston, SC 29406

We Consent:

---

David T. Pearlman  
Catherine D. Meehan  
Steinberg Law Firm  
P.O. Box 9  
Charleston, SC 29402  
Attorneys for Respondent Jeff Quinn



Robert M. Cook, II  
PO Box 3575  
Batesburg-Leesville, SC 29070  
Attorney for Appellant SCUEF

10-25-21

---

Anne V. Noonan  
Willson Jones Carter & Baxley  
4922 O'Hear Ave., Suite 301  
North Charleston, SC 29405  
Attorney for Respondents Yeamans Hall Club and Accident Fund Ins. Co. of America

---

John Gabriel Coggiola  
Willson Jones Carter & Baxley  
3600 Forest Drive, Suite 204  
Columbia, SC 29204  
Attorney for Respondents Yeamans Hall Club and Accident Fund Ins. Co. of America

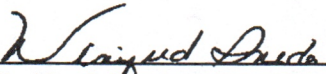
---

Phillip S. Ferderigos  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, SC 29402  
Attorney for Respondent Travelers Property and Casualty Ins. Co. of America

---

Michael Hannaway d/b/a Hannaway Painting  
2655 Midland Park Road  
Charleston, SC 29406

STEINBERG LAW FIRM, LLP

---

*10/25/2021*  
Winifred Snider, Paralegal to David T. Pearlman, Esquire  
and Catherine D. Meehan, Esquire  
Steinberg Law Firm, LLP  
PO Box 9  
Charleston, SC 29402  
(843) 720-2800  
dpearlman@steinberglawfirm.com  
cmeehan@steinberglawfirm.com  
Attorneys for Respondent Jeff Quinn

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

**RECEIVED**

**Oct 28 2021**

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

---

**SC Court of Appeals**

Appellate Case No.: 2021-000695  
South Carolina Workers' Compensation Claim No. 1819776

---

South Carolina Uninsured Employers Fund, ..... Appellant,

vs.

Jeff Quinn, Employee, Yeamans Hall Club, Employer, Accident Fund Insurance Co. of America, Carrier, Travelers Property Casualty Co. of America, Carrier, and Michael Hannaway d/b/a Hannaway Painting, Employer..... Respondents.

---

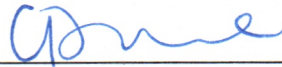
**PROOF OF SERVICE**

---

I certify that I have served the **Motion to Dismiss Respondent Quinn from Appeal** by electronic mail on the Honorable Jenny Abbott Kitchings, Clerk of Court of the South Carolina Court of Appeals at ctappfilings@sccourts.org, Robert M. Cook, II, Esquire, attorney for Appellant South Carolina Uninsured Employers Fund at robcook1965@yahoo.com, J. Gabriel Coggiola, Esquire, attorney for Respondents Yeamans Hall Club and Accident Fund Ins. Co. of America at jgcoggiola@wjlaw.net, John Fletcher, Esquire, attorney for Respondent Travelers Property and Casualty Co. of America at jfletcher@barnwell-whaley.com, and Respondent Michael Hannaway d/b/a Hannaway Painting at bluehog11@aol.com.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

STEINBERG LAW FIRM, LLP



10/28/21

---

Catherine D. Meehan  
Steinberg Law Firm, LLP  
PO Box 9  
Charleston, SC 29402  
(843) 720-2800  
dpearlman@steinberglawfirm.com  
cmeehan@steinberglawfirm.com  
Attorneys for Respondent Jeff Quinn