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May 3, 2013

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29111

**Re: South Carolina Second Injury Fund v. American Home Assurance Company**  
[ IN RE: Sarah Jones v. Spartanburg Regional Healthcare System ]  
Appellate Case No. 2013-000634

Dear Ms. Kitchings:


Please find enclosed an original and seven (7) copies of the Respondents' Motion to Allow Filing of Motion in Lower Court for the above-referenced matter, along with a Certificate of Service and a check for \$25.00 to cover the filing fee. We request that the Court clock and return one copy of the Motion. A return envelope is enclosed for your convenience.

By copy of this letter and the enclosures, all parties are served with the Respondents' Motion.

With kind regards,

Yours very truly,

GALLIVAN, WHITE & BOYD, P.A.

  
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**RECEIVED**  
MAY 06 2013  
**SC COURT OF APPEALS**

JMP/khp  
Enclosures

cc: The Honorable Hope Blackley, Clerk of Court, Spartanburg County  
Latonya D. Edwards, Esq.  
Virginia L. Crocker, Judicial Director, S. C. Workers' Compensation Commission