

Reply To  
VERNON F. DUNBAR  
Direct Dial: (864) 239-6735  
vernon.dunbar@mgclaw.com

March 22, 2022

**RECEIVED**

**Mar 22 2022**

**SC Court of Appeals**

VIA/EMAIL ONLY

V. Claire Allen, Deputy Clerk  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Raquacal Cunningham v. BMW Manufacturing and Hartford Accident  
& Indemnity Company c/o Sedgwick Claims Management Inc.  
Date of Accident: May 2, 2017  
WCC File No.: 1704918  
Our File No.: 20194.21241  
Claim No.: 30177811453-0001

Dear Ms. Allen:

On Monday, March 21, 2022, I received one copy of Appellant's Record on Appeal. However, the Record on Appeal does not comport with Rule 210 of the South Carolina Appellate Court Rules.

First, Appellant failed to include matters in the Record on Appeal as requested by Respondents in its Designation of Matters.

Second, the pages of the Record on Appeal are numbered incorrectly, are not numbered consecutively and are not numbered in accordance with the Index.

Third, with respect to Appellant's unfounded accusations of deceit and dishonesty, please find enclosed an Affidavit from our firm's mailroom supervisor indicating there was no receipt of the Record on Appeal prior to March 21, 2022.

Accordingly, Respondents shall file a Motion with the Court requesting correction of the Record on Appeal or, in the alternative, a dismissal of this matter.

By copy of this letter to Raquacal Cunningham, I am apprising her of my communication with the Court.

With kind regards, I am

Very truly yours,



Vernon F. Dunbar

VFD/tls

Enclosure

cc: Raquacal Cunningham, *Pro Se* Claimant

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**Mar 22 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

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Appellate Case No. 2021-000303  
WCC File No. 1704918

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Raqucal Cunningham ..... Appellant,

v.

BMW Manufacturing Corporation, Employer and,  
Hartford Accident & Indemnity Company, Carrier.. ..... Respondents,

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**AFFIDAVIT OF REBECCA M. BRISSEY**

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The undersigned, **REBECCA M. BRISSEY**, Office Services Coordinator of McAngus Goudelock & Courie, who, after being duly sworn, deposes and states as follows:

1. I am over 21 years of age and have personal knowledge of the matters set forth herein.
2. On January 19, 2022 and subsequent thereto, I have served as Office Services Coordinator. In addition to my supervisory duties, my job duties require me to direct and deliver incoming mail and to post outgoing mail; and to make certain correspondence is disseminated to the appropriate legal team.
3. In reviewing our computer systems and mail logs, Appellant's Record on Appeal was not delivered to Vernon F. Dunbar or any person at the Greenville location of McAngus Goudelock & Courie [hereinafter "MGC"] until March 21, 2022. However, there is no dispute that the correspondence could have been to the front desk in the lobby of our building, which is not a part of MGC.
4. Upon receipt of correspondence from the United States Postal Service provided by Appellant, the tracking number was used to attempt to locate the package that was mailed on January

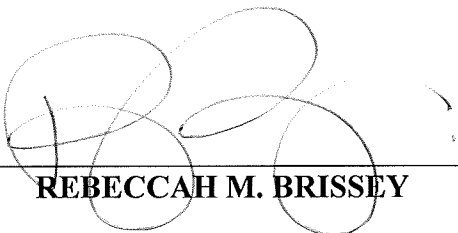
18, 2022 and subject to delivery on January 19, 2022. The tracking system of the United States Postal Service only shows that mail was delivered to a post office box at an unknown post office box number at 9:38 a.m. on January 19, 2022.

5. My research using the United States Postal Service's tracking number confirms that a document or correspondence was delivered on January 19, 2022, but at an unknown post office box address. The post office box registered to MGC did not contain a Record on Appeal on January 19, 2022 or any time thereafter to the present.

6. The United States Postal Service receipt provided by Appellant does not reflect delivery to MGC's Post Office Box address: 2980.

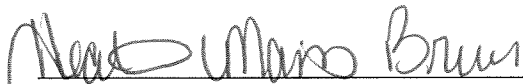
**FURTHER, AFFIANT SAYETH NAUGHT!**

**This 22<sup>nd</sup> day of March, 2022**

  
REBECCA M. BRISSEY

**SWORN TO AND SUBSCRIBED BEFORE ME**

This 22 day of March, 2022.

  
Notary Public for South Carolina  
My Commission Expires: 7.30.2025

