

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA
Workers' Compensation Commission

NOV 22 2023

SC Court of Appeals

WCC File No. 1506114
Appellate Case No.: 2019-001254

Frankie Padgett, Claimant, Respondent,

v.

Cast and Crew Entertainment Services, Inc., Employer, and American Zurich Insurance
Company, Carrier, Appellants.

MOTION FOR COSTS AND ATTORNEYS FEES

Appellant, by and through his undersigned attorney, hereby moves this Honorable Court for costs and attorney's fees in the amount of \$2,993.23 to be assessed against Appellants pursuant to Rules 222, SCACR, and as shown by attached itemized statement of costs. As grounds for this motion, Appellant would show this Court **affirmed** the Decision and Order of the South Carolina Workers' Compensation Commission.



Stephen B. Samuels
Samuels Reynolds Law Firm, LLC
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Columbia, SC 29201
(803) 779-4000
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Attorney for Respondent

Columbia, South Carolina
November 22, 2023

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Cast and Crew Entertainment Services, Inc., Employer, and American Zurich
Insurance Company, CarrierAppellants.

PROOF OF SERVICE

I certify that I, Claire Adams, Legal Assistant for the Samuels Reynolds Law Firm, LLC, have served the **Motion for Costs and Attorneys Fees** upon counsel for the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on November 22, 2023, addressed as follows:

Vernon F. Dunbar
McAngus, Goudelock & Courie LLC
P O Box 2980
Greenville, SC 29602
(864) 239-6735
Via Email: vernon.dunbar@mgclaw.com
Counsel for the Appellants

November 22, 2023



Claire Adams, Legal Assistant
SAMUELS REYNOLDS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000



STEPHEN B. SAMUELS
P. JASON REYNOLDS
C. DAVID BEALE, JR.
MICHAEL R. PARKS
ATTORNEYS AT LAW

November 22, 2023

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

RE: Frankie Padgett v. Cast and Crew Entertainment
Appellate Case No.: 2019-001254

Dear Ms. Kitchings:

Enclosed for filing please find our **Motion for Costs and Attorneys Fees** in the above-referenced appeal. I have also enclosed our firm's check in the amount of Fifty (\$50.00) Dollars as payment of the required filing fee. Please have your staff date stamp an extra copy of the Motion, and return a clocked copy to our courier.

By copy of this letter and enclosure to Vernon F. Dunbar, counsel of record for the Respondents, we are serving them with a copy of our **Motion for Costs and Attorneys Fees** as indicated by the attached Proof of Service.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your consideration.

With kindest regards, I am

Respectfully,

A handwritten signature in black ink that reads "Claire Adams". The signature is fluid and cursive.

Claire Adams

Legal Assistant to Stephen B. Samuels

/ca

Enclosure(s) as stated

cc: Vernon F. Dunbar