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May 08 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 1506114
Appellate Case No.: 2017-001535

Doretta Butler-Long, Claimant, Appellant,

v.

Illinois Tool Works and American Zurich Insurance
Company, Carrier, Respondent

MOTION FOR COSTS AND ATTORNEYS FEES

Appellant, by and through her undersigned attorney, hereby moves this Honorable Court for costs and attorney's fees in the amount of \$3,083.59 to be assessed against Respondents pursuant to Rule 222, SCACR, and as shown by attached itemized statement of costs. As grounds for this motion, Appellant would show this Court **Reversed** the Decision and Order of the South Carolina Workers' Compensation Commission. The Supreme Court denied Respondents Petition for Writ of Certiorari on April 16, 2024.



Stephen B. Samuels
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Attorney for Appellant

Columbia, South Carolina
May 8, 2024

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APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2017-001535

Doretta Butler-Long, Employee, Claimant, Appellant,

v.

ITW Labels, Employer and American Zurich Insurance
Company/Zurich North America c/o Broadspire, Carrier, Respondent.

PROOF OF SERVICE

I certify that I, Wanda Powell, Paralegal for the Samuels Reynolds Law Firm, LLC, have served the **Corrected Motion for Costs and Attorneys Fees** upon counsel for the Petitioners as indicated below:

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
Via Email: ctappfilings@sccourts.org

Jason W. Lockhart, Esquire
McAngus Goudelock & Courie, LLC
1320 Main Street, 10th floor
Columbia, SC 29201
Via Email: jlockhart@mgclaw.com

May 8, 2024



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

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

RE: Doretta Butler-Long v. Illinois Tool Works
Appellate Case No.: 2017-001535


Dear Ms. Kitchings:

Enclosed for filing please find our **Corrected Motion for Costs and Attorneys Fees** in the above-referenced appeal. It is my understanding that your office retained the \$50.00 filing fee check from the previously submitted Motion for Costs and Attorneys Fees. Please have your staff provide us with a date stamped copy of the **Corrected Motion for Costs and Attorneys Fees**.

By copy of this letter and enclosure to Jason Lockhart, counsel of record, we are serving him with a copy of our **Corrected 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,


Wanda Powell
Paralegal to Stephen B. Samuels

/wp
Enclosure(s) as stated

cc: Jason Lockhart, Esquire