

RECEIVED

Jan 15 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION
Appellate Panel
SCWCC File No. 2207846

Appellate Case No. 2024-000822

Sonya Parks, Claimant.....Appellant,

v.

Cintas Corporation, Employer, and
Farmington Casualty Company, Carrier.....Respondents.

**MOTION TO AMEND DESIGNATION OF MATTER, AMEND RECORD ON APPEAL
AND FOR EXTENSION OF TIME TO FILE FINAL BRIEFS**

Claimant and Appellant, Sonya Parks, with the consent of the Respondents, Cintas Corporation and Farmington Casualty Company, hereby moves to the Court to amend the Designation of the Matter, amend the Record on Appeal, and a twenty (20) day extension of time in which to file the Final Briefs.

In preparing for the Final Briefs, it came to the parties' attention that the deposition transcripts of the Respondent-Employees were not included in the Record on Appeal. Claimant and Appellant, Sonya Parks, with the consent of the Respondents, Cintas Corporation and Farmington Casualty Company, hereby moves the Court to amend the Designation of Matter, amend Record on Appeal, and a twenty (20) day extension of time in which to file the Final Briefs

to include the following depositions of the Respondent-Employees in the Designation of Matter and the Record on Appeal:

Gerrit Kurticz (Safety Manager)

Kami Phillips (Human Resources)

Tanner Burton (Production Manager)

Linda Saniewski (QA Supervisor)

Wanda Jefferson (Co-worker)

Finally, the Final Briefs are currently due on January 16, 2025. The requested extension would make the Final Briefs due February 5, 2025. The extension is requested to permit sufficient time for the Appellant to amend the Record on Appeal. Counsel for the Appellant has conferred with counsel for the Respondents, and he has consented to the motion to the Court to amend the Designation of the Matter, amend the Record on Appeal, and a twenty (20) day extension of time in which to file the Final Briefs.

Dated: Tuesday, January 14, 2025
Greenville, South Carolina

Respectfully Submitted
By: s/ Lola Stradford Richey
Lola Stradford Richey
South Carolina Bar Number: 8931
Attorney for Appellant
Post Office Box 10916
Greenville, South Carolina 29603
(864) 467-0503 (Office)
(864) 467-0646 (Fax)
lawfirm@richeyandrichey.com

RECEIVED

Jan 15 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE
STATE OF SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

APPELLATE CASE NUMBER: 2024-000822

Sonya Parks,

Claimant and Appellant,

v.

Cintas Corporation,

Employer and Respondent,

and

Farmington Casualty Company,

Carrier and Respondent.

PROOF OF SERVICE

I certify that I served the **MOTION TO AMEND DESIGNATION OF MATTER, AMEND RECORD ON APPEAL AND FOR EXTENSION OF TIME TO FILE FINAL BRIEFS** on Matthew LaFave of LaFave Bagley, LLC via email at the following for service:

matt@lafavebagley.com

denise@lafavebagley.com

Respectfully submitted,

By: s/ Lola Stradford Richey

Lola Stradford Richey
South Carolina Bar Number: 8931
RICHEY and RICHEY, PA
Attorney for the Appellant
Post Office Box 10916
Greenville, South Carolina 29603
(864) 467-0503 (Office)
(864) 467-0646 (Facsimile)
lawfirm@richeyandrichey.com
South Carolina Bar Number: 8931

Dated: Wednesday, January 15, 2025

RECEIVED

Jan 15 2025

SC Court of Appeals

**Richey and
Richey, P.A.
Attorneys at Law**

33 Market Point Drive
Greenville, South Carolina 29607

(864) 467-0503 Office

(888) 882-4878 Toll-Free

(864) 467-0646 Facsimile

lawfirm@richeyandrichey.com Email

Workers' Compensation
Personal Injury
Criminal Law

January 15, 2025

The Honorable Jenny Abbott Kitchings
Clerk of Court

South Carolina Court of Appeals

Post Office Box 11629

Columbia, South Carolina 29211

Re: *Sonya Parks -vs- Cintas Corporation*

Date of Accident: June 15, 2022

Appellate Case Number: 2024-000822

Dear Ms. Kitchings:

Please find attached for filing and the Court's consideration a Motion to Amend and Extension of Time to File Final Briefs in the matter referenced above. A check in the amount of \$50.00 representing the filing fee is enclosed with the mailed copy of this letter. If you should have any questions, please do not hesitate to contact our office.

With best wishes and warmest regards, I am

Truly yours,

Lola S. Richey

Lola S. Richey

Attorney at Law

Enclosures

Copy:

Matthew C. LaFave

LaFave Bagley, LLC

2019 Park Street

Columbia, South Carolina 29201

matt@lafavebagley.com