

McDANIEL LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW
1315 ELMWOOD AVENUE
COLUMBIA, SOUTH CAROLINA 29201

Proudly representing injured workers
for over 45 years.

Preston F. McDaniel

Daniel E. Peagler

Telephone (803) 771-7211

Facsimile (803) 252-0709

August 28, 2025

VIA EMAIL: ctappfilings@sccourts.org

AND US MAIL

Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

105696

RECEIVED
SEP 02 2025
SC Court of Appeals

RE: **Evaristo Verdugo Morales v. Insulation by Cohen's, LLC**
Appellate Case No. 2025-000026

Dear Ms. Kitchings:

Please find attached the **MOTION TO SUPPLEMENT THE RECORD AND TO FILE AMENDED INITIAL BRIEF OF RESPONDENT-APPELLANT AND FOR A STAY PENDING A DECISION ON THE MOTION PURSUANT TO RULE 240(b); AND EN BANC HEARING REQUEST** in the above-referenced matter for filing with the Court, along with the required filing fee. I would appreciate you returning a clocked-in copy to me via email.

By copy of this letter with enclosures, I am hereby serving Counsel of Record with a copy of same.

Sincerely yours,



Preston F. McDaniel

PFM/kth
Enclosures

cc: Don C. Gibson, Esquire (via email only)
Stephen L. Brown, Esquire (via email only)
Robert P. Gruber, Esquire (via email only)
Russell G. Hines, Esquire (via email only)
Graydon V. Olive, IV, Esquire (via email only)



FP [®] **US POSTAGE**
\$002.44[®]
First-Class - IMI
ZIP 29201
08/28/2025
036B 0011815149

McDaniel Law Firm
ATTORNEYS and COUNSELORS AT LAW
1315 Elmwood Avenue
Columbia, South Carolina 29201

RECEIVED

SC Court of Appeals

RECEIVED

SEP 02 2025

SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211