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**Mar 26 2026**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from The South Carolina  
Workers' Compensation Commission

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Cynthia C. Dooley, Commissioner  
Gene McCaskill, Commissioner  
R. Michael Campbell, Commissioner

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Appellate Case No. 2025-000026  
WCC File No. 1921668

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Evaristo Verdugo Morales, Claimant,

Respondent-Appellant,

v.

Insulation by Cohen's, LLC, Employer,  
and Builders Premier Insurance Company, Carrier,

Appellants-Respondents.

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**RETURN TO RESPONDENT-APPELLANT'S MOTION DATED MARCH 20, 2026**

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CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

Robert P. Gruber (SC Bar No. 15581)

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Graydon V. Olive, IV (SC Bar No.: 105319)

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*Attorneys for Appellants-Respondents*

COME NOW Appellants-Respondents, Insulation By Cohen's & Sprayfoam by Cohen's, LLC, and Builders Premier Insurance Company, respectfully submit, by and through their undersigned counsel, this Return to Respondent-Appellant's Motion dated March 20, 2026 and states as follows:

1. Appellants-Respondents do not object to Respondent-Appellant's request for an extension of time to file a Supplemental Record on Appeal, but Respondent-Appellant's Motion indicates an intent to include additional materials not contained in the original Record on Appeal or Respondent-Appellant's Designation of Matter.

2. Under these circumstances, Appellants-Respondents respectfully submit that Respondent-Appellant must first move for leave of court to file an Amended Designation of Matter, identifying the additional materials sought to be included.

3. Absent an Amended or Supplemental Designation of Matter, Appellants-Respondents may be placed in the untenable position of being asked to certify a Supplemental Record on Appeal that includes materials not properly designated or authorized under the Rules.

4. Appellants-Respondents therefore respectfully request that the Court first permit Respondent-Appellant to file an Amended Designation of Matter,

thereby permitting the inclusion of the additional materials in the Supplemental Record on Appeal in accordance with the Rules.

5. Additionally, Appellants-Respondents respectfully request that this Court hold this appeal and any deadlines in abeyance until such time as the Supplemental Record on Appeal has been filed and served.

6. Appellants-Respondents submits that granting the requested extension subject to these procedural safeguards will promote clarity, fairness, and compliance with the Rules, while avoiding unnecessary disputes regarding the contents or certification of the Record on Appeal.

WHEREFORE, Appellants-Respondents respectfully request that the Court grant Respondent-Appellant's Motion for Extension of Time subject to the conditions outlined above, require Respondent-Appellant to file an Amended Designation of Matter, and hold the appeal and its deadline in abeyance until the Supplemental Record on Appeal has been properly filed and served.

[*Signature page for Return to Respondent-Appellant's Motion Dated March 20, 2026, Appellate No. 2025-000026*]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*

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*Attorneys for Insulation By Cohen's &  
Sprayfoam by Cohen's, LLC and  
Builders Premier Insurance Company*

Charleston, South Carolina

March 25, 2026

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**THE STATE OF SOUTH CAROLINA  
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**PROOF OF SERVICE**

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*Attorneys for Appellants-Respondents*

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellants-Respondents, hereby certify that their **RETURN TO RESPONDENT-APPELLANT'S MOTION DATED MARCH 20, 2026** was served on all other parties to this appeal on March 25, 2026, via email (see attached) to their following counsel of record:

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*Attorneys for Evaristo Verdugo Morales*

CLEMENT RIVERS, LLP

By: s/Stephen L. Brown  
Stephen L. Brown (SC Bar No. 66468)  
*Attorney for Appellants*

Charleston, South Carolina

March 25, 2026

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Mar 26 2026

Beach, Sarah

SC Court of Appeals

**From:** Beach, Sarah  
**Sent:** Thursday, March 26, 2026 1:39 PM  
**To:** Gibson, Don; Rose Thielke; Lindsay Willyerd; Gruber, Robert; 'Kim Hinkle'  
**Cc:** Brown, Stephen L.; Hines, Russell; Olive, IV, Graydon; Justman, Aimee  
**Subject:** Evaristo Verdugo Morales v. Insulation by Cohen's, LLC; Appellate Case No. 2025-000026  
**Attachments:** Morales.pdf

Good afternoon,

Attached for service on you in the above-referenced matter, please find a Return to Respondent-Appellant's Motion Dated March 20,2026.

Sarah Beach  
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Secretary  
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