

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

The Honorable W. Jeffrey Young, Circuit Court Judge

Appellate Court Tracking No. 2014-002214
Civil Action No. 2013-CP-43-02286
WCC File No. 9930399

RECEIVED
MAR 25 2015
SC Court of Appeals

Arrowpoint Capital Corporation/Arrowood Indemnity Co., Carrier, Appellant

v.

South Carolina Second Injury Fund, Respondent

[In re: C.L. Williams, Employee/Claimant

v.

Yuasa Exide, Incorporated, Employer]

MOTION TO PROVIDE FEWER COPIES OF RECORD ON APPEAL

TO: THE HONORABLE JENNY ABBOTT KITCHINGS, CLERK OF COURT, SOUTH
CAROLINA COURT OF APPEALS:

YOU WILL PLEASE TAKE NOTICE Appellant Arrowpoint Capital Corporation/
Arrowood Indemnity Company, hereby submits for consideration this Motion to provide fewer
than fifteen (15) copies of the Record on Appeal. The grounds for this Motion are as follows:

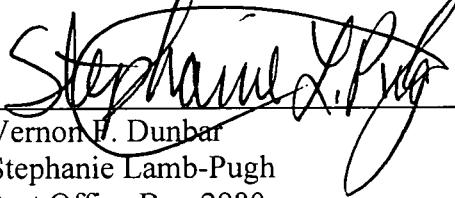
1. Pursuant to Rule 210 of the South Carolina Appellate Court Rules, the Appellants
must file with the Clerk of the Appellate Court fifteen (15) copies of the Record on
Appeal no later than the date the Appellant's Final Briefs are due under Rule 211.

2. Based on information received from the Court in the past, it is Appellant's understanding that the Court may not require fifteen (15) copies in order to review the Record on Appeal. Upon information and belief, this is due to the Court's new electronic system of uploading the Record on Appeal.
3. Because the Record on Appeal in this case is over 400 pages and because Appellant has appealed two other companion matters, Appellant submits that the cost of producing this Record on Appeal will be quite substantial.
4. Should the Court be able to make a determination in this case without fifteen (15) copies of the Record on Appeal, Appellant respectfully requests that they be permitted to provide fewer than fifteen (15) copies. Appellant leaves the number of copies required to this Honorable Court's discretion.

For the reasons stated above, Appellant respectfully requests that they be permitted to provide fewer than fifteen (15) copies of the Record on Appeal, the number of which Appellant will leave to the discretion of the Court.

Respectfully submitted,

McANGUS GOUDELOCK & COURIE, LLC



Vernon H. Dunbar
Stephanie Lamb-Pugh
Post Office Box 2980
55 East Camperdown Way, Suite 300 (29601)
Greenville, South Carolina 29602
(864) 239-4000
Attorneys for Appellants

March 20, 2015

23

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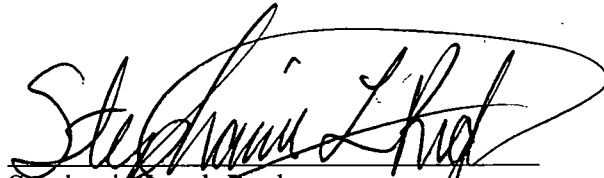
Yuasa Exide, Incorporated, Employer]

CERTIFICATE OF SERVICE

I hereby certify that I have this ^{13rd}~~20th~~ day of March 2015, caused to be served a copy of Motion to Provide Fewer Copies of Record on Appeal by mailing a copy of same, postage prepaid, in the United States mail, with sufficient postage affixed as follows:

Latonya D. Edwards, Esquire
Dilligard Edwards, LLC
3790 Fernandina Rd., Suite 103
Columbia, South Carolina 29210

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

A handwritten signature in black ink, appearing to read "Stephanie Lamb Pugh", written over a horizontal line.

Stephanie Lamb Pugh
McAngus, Goudelock & Courie LLC
Post Office Box 2980
55 East Camperdown Way, Suite 300 (29601)
Greenville, South Carolina 29602
(864) 239-4000

Attorneys for Appellants

Reply To

STEPHANIE LAMB PUGH
Direct Dial: (864) 239-6710
stephanie.pugh@mgclaw.com

March 20, 2015

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MAR 25 2015
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: Yuasa-Exide, Inc. and Arrowpoint Capital Corporation v. South Carolina
Second Injury Fund
In Re: C.L. Williams v. Yuasa-Exide, Inc and Arrowpoint Capital Corp
Appellate Court Tracking No.: 2014-002214
Civil Action No.: 2013-CP-43-02286
Our File No.: 20113.14171

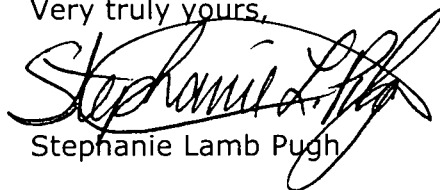
Dear Ms. Kitchings:

Please find enclosed the original and six copies of a Motion to Provide Fewer Copies of the Record on Appeal and a Certificate of Service for the same in the above-referenced matter. By copy of this letter to Respondent's attorney, Latonya Edwards, we are notifying her of this submission and serving a copy of the same upon her by mail.

Should you have any questions or concerns, please feel free to contact my office.

With kind regards, I remain

Very truly yours,



Stephanie Lamb Pugh

SP/ma

Enclosures

cc: Latonya D. Edwards, Esquire, Dilligard Edwards, LLC
Eric Rowell, Arrowpoint Capital Corp (via email)