

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

RECEIVED

J. Derham Cole, Circuit Court Judge

AUG 13 2015

Appellate Case No. 2015-000359
Case No. 2011-CP-42-3951

SC Court of Appeals

Dickie Shults,Appellant,

v.

Angela G. Miller,Respondent.

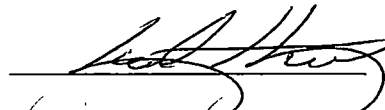
APPELLANT'S REPLY TO MOTION TO SEAL

The Appellant filed a motion to seal Exhibits 2 and 3 of Respondent's Reply Brief in Support of Motion to Compel Appellant to Produce Complete Record on Appeal, served July 27, 2015, so that the two exhibits (three documents) are not available to the public in person or online. In the Respondent's Return, the Respondent states that she "takes no position" on the issue of whether the documents should be available to the public or online. (Return p. 2). As such, the Respondent does not make any substantive arguments opposing the motion to seal.

The Appellant would like to remind the Court that the Respondent has knowledge of, and access to, the documents in question only because Mr. Rob Davis signed a confidentiality agreement, pursuant to Rule 8(a), South Carolina Alternative Dispute Resolution Rules. The documents were not turned over in discovery to Respondent

Miller in the case of Shults vs. Miller. The documents were never filed with a trial court, except for Exhibit 3, which was filed with the Workers' Compensation Commission and is protected from public disclosure pursuant to South Carolina Code § 42-19-40 (Records shall not be public). For these reasons, the motion should be granted.

August 11, 2015



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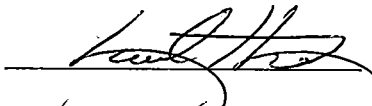
Angela G. Miller,Respondent.

PROOF OF SERVICE

I certify that I have served the Appellant's Reply to Motion to Seal on Angela G. Miller by depositing a copy of it in the United States Mail, postage prepaid, on August 11, 2015, addressed to her attorney of record:

Robert E. Davis, Esq.
The Ward Law Firm, P.A.
P.O. Box 5663
Spartanburg, SC 29304

August 11, 2015


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