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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Hon. Robert E. Hood, Circuit Court Judge

**RECEIVED**

AUG 14 2015

Appellate Case No.: 2015-000244

SC Court of Appeals

Kerry Paul,

Appellant,

v.

South Carolina Department of  
Employment and Workforce,

Respondent.

RESPONDENT'S MOTION TO FILE AMENDED INITIAL BRIEF

Respondent South Carolina Department of Employment and Work Force, by and through its undersigned counsel, moves for leave to correct and/or amend its Initial Brief to allow the insertion of "Appendix A," which although cited in Respondent's Initial Brief (specifically on pages 2 and 14), was inadvertently omitted from the initial filing. As described on page two of the Respondent's originally filed brief, Appendix A contains a list of the undisputed factual findings and legal conclusions contained in the circuit court's January 6, 2015 Order. *See* Respondent's Initial Brief, filed August 10, 2015, at p.2, fn 1.

Based upon and due to the forgoing, Respondent respectfully requests that it be permitted to file an Amended Initial Brief that includes the inadvertently omitted attachment, Appendix A. Along with this Motion, Respondent submits an original

proposed "Amended Initial Brief," which includes the omitted Appendix A. Undersigned counsel certifies that no changes (other than insertion of the appendix) have been made to this proposed Amended Initial Brief. Respondent respectfully requests that this Amended Initial Brief be approved for filing by this Court.

August 12, 2014.



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ATTORNEYS FOR RESPONDENT  
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AND WORKFORCE

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CERTIFICATE OF SERVICE

The undersigned, an employee of Hamilton Martens Ballou & Carroll, LLC certifies that the Motion of South Carolina Department of Employment and Workforce to Amend Respondent's Initial Brief and proposed Amended Initial Brief was served upon other counsel of record by depositing same in the United States Mail, with sufficient postage affixed and addressed as follows:

Nancy Bloodgood  
895 Island Park Drive  
Suite 202  
Charleston, SC 29492

August 12, 2015

  
\_\_\_\_\_  
L. MELIA SWEATT