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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

RECEIVED

DEC 04 2015

SC Court of Appeals

SCWCC File No. 1401281

Case No. 2015-002192

Yolanda Lucas, Employee.....Respondent,

v.

Community Loans of America, Inc., Employer, and
Continental Indemnity Company, Carrier.....Appellants.

JOINT MOTION FOR LEAVE TO SUBMIT SETTLEMENT

WILL YOU PLEASE TAKE NOTICE that Appellants, Community Loans of America, Inc. and Continental Indemnity Company, and Respondent, Yolanda Lucas, by and through their undersigned attorneys, do hereby move, pursuant to the South Carolina Appellate Court Rule 240, for an Order from the Court granting leave to the interested parties to file their terms of settlement (hereinafter referred to as "Final Lump Sum Agreement and Release") with the South Carolina Workers' Compensation Commission ("hereinafter referred to as "Commission") for approval of the same. Moreover, the interested parties do hereby further move for an Order from the Court, wherein any and all filing deadlines and time relating to the above named matter be held in abeyance for a reasonable amount of time for purposes of filing the Final Lump Sum

Agreement and Release with the Commission for approval. The grounds for the Motion are as follows:

1. That Appellants timely filed a Notice of Appeal with this Court;
2. That the interested parties have agreed to settlement terms and are in the process of filing the Final Lump Sum Agreement and Release with the Commission for approval of the same; and
3. That as the Final Lump Sum Agreement and Release shall be approved upon its filing with the Commission, the interested parties will submit a copy of the Final Lump Sum Agreement and Release that has been stamped as "filed" by the Commission to this Court for its approval of the same; further requesting that this Court dismiss the appeal and remand jurisdiction of the same to the Commission for final disposition.

WHEREFORE, Appellant and Respondents respectfully request that this Court issue an Order granting leave of the parties to file the aforementioned Final Lump Sum Agreement and Release with the Commission for approval of the same. Moreover, the interested parties respectfully request that any and all filing deadlines and time relating to the above named matter be held in abeyance for a reasonable amount of time for purposes of filing the Final Lump Sum Agreement and Release with the Commission for approval. The Final Lump Sum Agreement and Release shall be approved upon its filing with the Commission. As such, the interested parties further respectfully request that this Court issue an Order formally dismissing the above named matter and remanding jurisdiction of the same to the Commission for final disposition upon its receipt of a copy of the Final Lump Sum Agreement and Release that has been stamped as "filed" by the Commission.

RESPECTFULLY SUBMITTED:

D. Michael Kelly, Esquire

P.O. Box 8118

Columbia, SC 29202

Telephone: (803) 726-0123

By: 

D. Michael Kelly, Esquire
Attorney for Respondent

Wood Law Group, LLC

P. O. Box 20550

Charleston, SC 29413

Telephone: (843) 577-5732

By: 

Kathryn F. Walton, Esquire
Bar No. 75639
Attorney for Appellants

November 30, 2015

THE STATE OF SOUTH CAROLINA
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APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

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Yolanda Lucas, Employee,.....Respondent,

v.

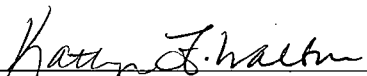
Community Loans of America, Inc., Employer,
and Continental Indemnity Company, Carrier.....Appellants.

PROOF OF SERVICE

I certify that I have served the **Joint Motion for Leave to Submit Settlement** upon all interested parties by depositing a copy of the same in the United States Mail, postage prepaid, on December 1, 2015 addressed as follows:

D. Michael Kelly, Esquire
P.O. Box 8113
Columbia, South Carolina 29202

Ms. Amy Bracy, Judicial Director
South Carolina Workers' Compensation Commission
P.O. Box 1719
Columbia, SC 29202-1715


Kathryn Fiehrer Walton
Wood Law Group, LLC
P.O. Box 20550
Charleston, South Carolina 29413
(843) 577-5732
Attorney for Appellants

WOOD LAW GROUP, LLC
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CHARLESTON, SOUTH CAROLINA 29407
(843) 577-5732 FAX (843) 577-4326

J. HUBERT WOOD, III

KATHRYN F. WALTON*
MATTHEW J. FULTZ

December 1, 2015

REPLY TO
P.O. Box 20550
CHARLESTON, SOUTH CAROLINA 29413

*MEDICARE SET-ASIDE CERTIFIED CONSULTANT

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

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SC Court of Appeals

Re: Yolanda Lucas v Community Loans of America, Inc.
Court of Appeals Case No.: 2015-002192
WCC File No.: 1401281
Carrier File No.: 74798
Date of Accident: January 11, 2014
Our File No.: 94.14

Dear Ms. Kitchings:

Please find enclosed an original and six (6) copies of a Joint Motion for Leave to Submit Settlement along with a Certificate of Service regarding the same. Also enclosed is my firm's check in the amount of \$25.00 representing the applicable filing fee for the Motion.

By copy of this letter and Certificate of Service, I am serving all interested parties with a copy of the Joint Motion for Leave to Submit Settlement. Please file the original and six (6) copies of the Motion as well as the original Certificate of Service. Thank you for your time and attention to this matter.

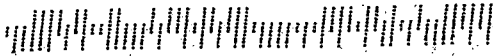
Very truly yours,



Kathryn Fiehrer Walton

KFW/llk
Enclosures

cc: Mr. Michael Heller (via email only) (w/enc.)
D. Michael Kelly, Esquire (w/enc.)
Ms. Amy Bracy, Judicial Director (w/enc.)



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ATTORNEYS AT LAW
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The Honorable Jenny Abbott Kitchings
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Columbia, South Carolina 29201