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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

W.C.C. File No.: 1315636

Kathey L. Staton, Employee, Appellant,

v.

Mohawk Industries, Inc., Employer, and
Liberty Mutual, Carrier, Respondents.

**MOTION FOR CORRECTION AND/OR AMENDMENT
OF RECORD ON APPEAL**

Pursuant to Rule 210, SCACR, Respondents move this Court to order that the following corrections be made to the Record on Appeal ("ROA"):

1. The Transcript of deposition of Kathey L. Staton, taken May 19, 2014, which was designated by Respondents, is missing from the ROA.
2. Pages 62-64 of the APAs, which were designated by Respondents, are missing from the ROA.

Respondents request this Court to order Appellant to correct and/or amend the ROA as outlined above. Respondents further request this Court to order that the Final Briefs in this appeal will not be due until the ROA has been properly corrected and/or amended.

This motion conforms with Rule 240, SCACR.

Respectfully submitted,

McANGUS GOUDELICK & COURIE, LLC

December 18, 2015



Helen F. Hisel, S.C. Bar No.: 76124
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*Attorneys for Respondents Mohawk Industries, Inc.
and Liberty Mutual*

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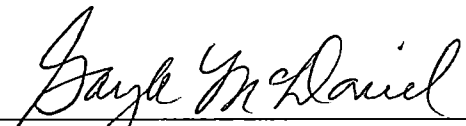
v.

Mohawk Industries, Inc., Employer, and
Liberty Mutual, Carrier, Respondents.

PROOF OF SERVICE

I certify that on the 18th day of December 2015, I served the **Motion for Correction and/or Amendment of Record on Appeal** on Kathey L. Staton by depositing a copy of it in the United States Mail, postage prepaid, addressed to her attorney of record:

Stephen J. Wukela, Esq.
Wukela Law Firm, LLC
P.O. Box 13057
Florence, SC 29504-3057



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Legal Assistant to Helen F. Hiser
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Reply To

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Via U.S. Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Kathey Staton vs. Mohawk Industries and Liberty Mutual Insurance
 Company
 Date of Accident: June 28, 2013
 WCC File No.: 1315636
 Our File No.: 2095.14124
 Claim No.: WC555-C21415
 Appeal No.: 2015-001675

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondents' Motion for Correction and/or Amendment of Record on Appeal, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the self-addressed, stamped envelope. Also enclosed is our firm's check in the amount of \$25 for filing the motion.

If you have any questions, please do not hesitate to contact me

Very truly yours,

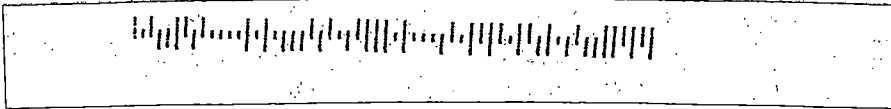

Helen F. Hiser

Enclosures

cc: Stephen J. Wukela, Esq.

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