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THE STATE OF SOUTH CAROLINA
In the Supreme Court

S.C. Supreme Court

APPEAL FROM RICHLAND COUNTY
APPELLATE PANEL, WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2015-000493
WCC No. 11119343

Thomas Chad Hilton Petitioner,

v.

Flakeboard America Limited and
Liberty Mutual Insurance Company Respondents.

**MOTION TO FILE AMICUS BRIEF:
INJURED WORKERS' ADVOCATES**

This motion is filed pursuant to Rules 213 and 240 of the South Carolina Appellate Court Rules. Rule 213 governs amicus briefs. Rule 240 governs motions, generally.

Injured Workers' Advocates is a nonprofit organization of South Carolina attorneys. IWA has no direct or indirect interest in this case other than how it will impact the rights of the citizens of the State of South Carolina and the workers' compensation system.

IWA offers an amicus brief with the hope that the information in the brief will be helpful to the Court. The brief is conditionally filed with this motion.

No party contributed financially or substantively to the brief. Andrew Safran, the attorney for Petitioner, is an IWA member, but he was not involved in the decision to author an amicus brief and he did not contribute to the brief's contents.

Respectfully submitted,

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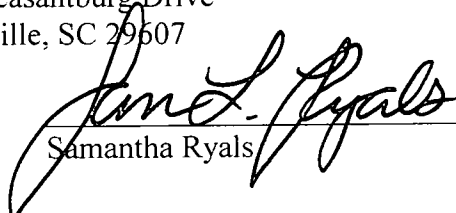
Flakeboard America Limited and
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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel of record with a copy of the *Motion to File Amicus Brief: Injured Workers' Advocates* and the conditionally filed *Brief of Amicus Curiae* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

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December 30, 2015