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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION
APPELLATE PANEL

Appellate Case No. 2015-000486
W.C.C. File No. 1219902

Anthony Ransom, Claimant,..... Respondent,

v.

John Clark, Employer, Builders Firstsource, and Liberty Mutual Insurance Co.,
Carrier, and S.C. Uninsured Employers Fund, Defendant,

of whom Builders Firstsource and Liberty Mutual Insurance Co. are the Appellants.

MOTION TO STAY

Pursuant to Rule 240, SCACR, Appellants Builders Firstsource and Liberty Mutual Insurance Co. (collectively "Appellants") move to stay further deadlines in this appeal. Appellants' motion is based upon Respondent's failure to comply with the South Carolina Appellate Court Rules and the directive by this Court, discussed in greater detail, below.

ARGUMENT

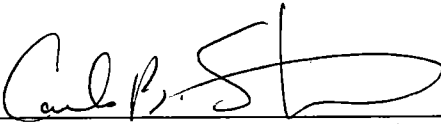
Appellants filed their Notice of Appeal on March 6, 2015. Appellants filed their Initial Brief and Designation of Matter to be Included in the Record on Appeal ("Designation of Matter") on June 8, 2015. Appellants received the Court's December 30, 2015 correspondence addressed to Respondent acknowledging its receipt of his Initial

Brief and Designation of Matter and requiring Respondent to correct noted deficiencies: (1) paginating the Initial Brief; and (2) serving and filing a proof of service of the Initial Brief and Designation of Matter. Appellants received Respondent's undated Initial Brief on January 11, 2016 in an envelope post-marked January 9, 2016. However, Appellants have yet to be served with Respondent's Designation of Matter or Proof of Service as provided for in Rules 208, 209 and 262, SCACR, and as required by the Court's December 30, 2015 correspondence to Respondent.

CONCLUSION

For the reasons stated herein, Appellants respectfully move this Court for an order to stay further deadlines pending resolution of the deficiencies addressed in this motion.

January 12, 2016

By: 
Carmelo B. Sammataro (Bar No. 66145)
TURNER PADGET GRAHAM & LANEY P.A.
Post Office Box 1473
Columbia, SC 29202
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ATTORNEYS FOR APPELLANTS

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Carrier, and S.C. Uninsured Employers Fund, Defendant,

of whom Builders FirstSource and Liberty Mutual Insurance Co. are the Appellants.

PROOF OF SERVICE

I certify this 12th day of January 2016 that I have served copies of the MOTION
TO STAY, by mailing same, postage prepaid in the United States mail, addressed to the
following:

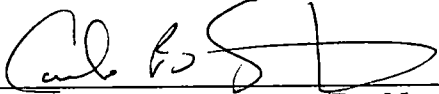
Anthony Ransom
277 Old Baggett Road
Nakina, NC 28455
RESPONDENT, *PRO SE*

John Clark
1076 Weslin Creek Drive
Myrtle Beach, SC 29588

Lisa C. Glover, Esquire
S.C. Uninsured Employers' Fund
P. O. Box 210039
Columbia, SC 29221
ATTORNEYS FOR S.C. UNINSURED
EMPLOYERS' FUND

(Signature page to follow.)

January 12, 2016

By: 
Carmelo B. Sammataro (Bar No. 66145)
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January 12, 2016

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SC Court of Appeals

VIA HAND DELIVERY:

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Anthony Ransom v. John Clark, Builders FirstSource, Liberty Mutual Insurance Co., and S.C. Uninsured Employers Fund
Appellate Case No.: 2015-000486
File No.: 1464.6783

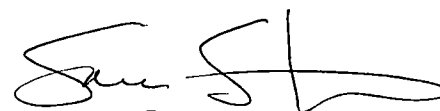
Dear Ms. Kitchings:

Enclosed please find the original and seven copies of the Motion to Stay regarding the above-referenced matter. Also enclosed are the original and one copy of the Proof of Service and our check for the filing fee. Please file the original documents and return a clocked copy to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.


Carmelo B. Sammataro

CBS/tj

Enclosures

cc: Lisa C. Glover, Esquire
Anthony Ransom, Respondent *pro se*
John Clark
(w/enc.)