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JAN 11 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC File No. 1315636

Kathey L. Staton, Employee, Appellant/Claimant,

vs.

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

**MOTION TO AMEND
RECORD ON APPEAL AND
APPELLANT'S FINAL BRIEF**

STEPHEN J. WUKELA
WUKELA LAW FIRM
ATTORNEY FOR APPELLANT
PO BOX 13057
FLORENCE SC 29504
843-669-5634

Appellant, Kathey L. Staton, moves this Honorable Court, pursuant to Rule 224 of the South Carolina Appellate Rules, for an Order permitting the filing and service of an Amended Record on Appeal and Amended Appellant's Final Brief. This Motion is based on the following grounds:

1. Appellant filed the Final Brief and Record on Appeal on December 30, 2015. In the Record on Appeal the Transcript of the deposition of the Appellant was listed in the Index on page 82, however, in the actual Record the Transcript of the Full Board Hearing of May 18, 2015 was inserted at page 82. Therefore, this meant the Transcript of the Hearing of May 18, 2015 was inserted twice.

2. As a result of the omission of the Transcript of the Deposition of Appellant, the page numbers referenced in the Final Brief are in need of correction.

3. Appellant respectfully requests this Honorable Court permit the amendment of the Record on Appeal and the Final Brief of Appellant so that the printing error may be corrected.

4. Counsel for Respondents is aware of the need for correction of the Record on Appeal and the Final Brief of Appellant and has been provided with a copy of the Amended Record on Appeal.

5. Appellant believes that no harm would be caused to the Respondents by the granting of this Motion arising from the facts set out above and would further result in justness and fairness

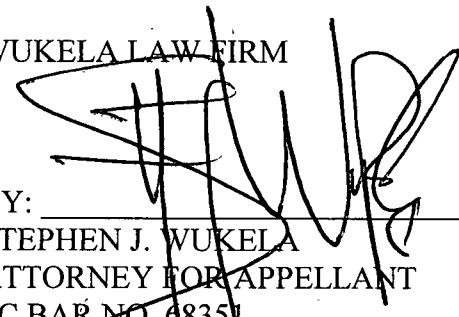
to the parties.

Respectfully submitted,

Florence, SC

January 8, 2016

WUKELA LAW FIRM

BY: 
STEPHEN J. WUKELA
ATTORNEY FOR APPELLANT
SC BAR NO. 68351
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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Panel Order

WCC File No. 1315636

Kathey L. Staton, Employee, Appellant/Claimant,

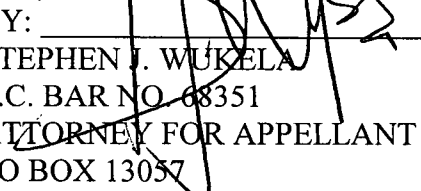
vs.

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

PROOF OF SERVICE

I certify that I have served the Appellant's Motion to Amend the Record on Appeal and the Final Brief of Appellant on Respondents by depositing a copy of it in the United States Mail, postage prepaid, on January 28, 2016, addressed to their attorneys of record, J. Brandon Hylton, Esquire, at his office at McAngus, Goudelock & Currie, LLC, PO Box 7489, Florence, SC, 29502; and Helen F. Hiser, at her office at McAngus, Goudelock & Currie, LLC, PO Box 650007, Mt. Pleasant SC 29465.

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January 8, 2016

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SC Court of Appeals

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

Re: Kathey L. Staton v. Mohawk Industries, Inc.
Appellate Case No. 2015-001675

Dear Ms. Kitchings:

With regard to the above matter, please find enclosed for the Court's consideration a Motion to Amend Record on Appeal and Appellant's Final Brief, along with the Twenty-Five (\$25.00) Dollar filing fee. By copy of this letter, I am serving the attorneys for Respondents with this Motion.

I am herewith enclosing for filing the Amended Record on Appeal and the Appellant's Amended Final Brief, a copy of which I am serving on counsel for Respondents.

With kind regards, I am

Yours truly,

WUKELA LAW FIRM

STEPHEN J. WUKELA

SJW:jpb

Enclosures

cc: J. Brandon Hylton, Esquire
Ms. Helen Hiser