

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2016-001180

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SEP 08 2016
SC Court of Appeals

Kim E. Argo, Claimant, Appellant,

v.

Flexible Technologies, Inc., Employer, and
Liberty Insurance Corporation, Carrier, Respondents.

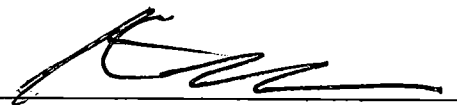
**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Appellant proposes the following be included in the Record on Appeal:

1. Form 50
2. Claimant's Form 58
3. Deposition of Haaris Mir, dated January 21, 2015
4. Order, dated May 6, 2016.
5. Order dated September 11, 2015
6. Form 30
7. Claimant's APA submissions, pages 1-167, 171-352.
8. Defendants' APA submissions, pages 346-364, 373-402, 412-449.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted



Stephen B. Samuels
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Columbia, South Carolina
September 6, 2016

ATTORNEY FOR APPELLANT

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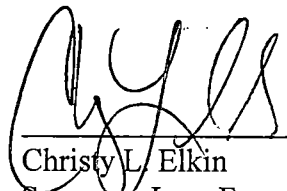
Flexible Technologies, Inc., Employer, and
Liberty Insurance Corporation, Carrier, Appellants.

PROOF OF SERVICE

I certify that I, Christy L. Elkin, administrative assistant for the Samuels Law Firm, LLC, have served the **Appellants' Initial Brief and Designation of Matter** upon counsel for the Appellants by depositing a copy of it in the United States Mail, postage prepaid, on September 6, 2016, addressed as follows:

L. Brenn Watson, Esq
Willson Jones Carter & Baxley, PA
872 S. Pleasantburg, Dr
Greenville, SC 29607

September 6, 2016



Christy L. Elkin
SAMUELS LAW FIRM, LLC
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STEPHEN B. SAMUELS
ANDREW J. BROWN
ATTORNEYS AT LAW

September 6, 2016

Via US Mail Courier

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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RE: Kim E. Argo v. Flexible Technologies, Inc. and Liberty Insurance Corporation
Appellate Case No.: 2016-000617

Dear Ms. Kitchings:

Please find enclosed the original and one copy of **Initial Brief of Appellant** and **Designation of Matter** for filing in the above-referenced matter. Please file the original and return the clocked copy with our courier.

By copy of this letter and enclosure to L. Brenn Watson, we are serving opposing counsel with a copy of our **Initial Brief of Appellant** and **Designation of Matter** as indicated by the attached Proof of Service.

Thank you for your consideration in this matter. Please contact us with any questions or if further information is needed from our office.

With kindest regards, I am

Respectfully,

Christy L. Elkin
Admin Assist for Stephen B. Samuels

/cle
Enclosure(s) as stated

cc: L. Brenn Watson, Esquire

WE WORK FOR THE PEOPLE WHO WORK.

UNITED STATES POSTAGE



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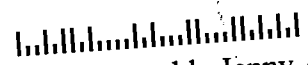
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