



STEPHEN B. SAMUELS  
ANDREW J. BROWN  
ATTORNEYS AT LAW

September 19, 2016

**RECEIVED**

SEP 19 2016

S.C. SUPREME COURT

**VIA HAND DELIVERY**

Honorable Daniel E. Shearouse  
Clerk of Court, S.C. Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29201

Re: Hector G. Fragosa v. Kade Construction, LLC  
Appellate Case No.: 2014-002354

Dear Mr. Shearouse:

Enclosed for filing please find the original and six (6) copies of our **Petition for a Writ of Certiorari** in the above-referenced matter along with our check in the amount of One Hundred (\$100.00) Dollars as payment of the filing fee. We have also enclosed two (2) copies of the **Appendix**, one of which is unbound per Rule 267(d).

By copy of this letter and enclosure to Michael Burkett and J. Gabriel Coggiola, counsel of record for the Respondents, we are serving a copy of our **Petition for a Writ of Certiorari** and **Appendix** upon them as indicated by the attached Proof of Service. We are also providing a copy of our **Petition for a Writ of Certiorari** to the South Carolina Court of Appeals pursuant to Rule 242(c).

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your consideration.

With kindest regards, I am

Yours very truly,

Stephen B. Samuels

SBS/krc  
Enclosure(s) as stated

cc: Michael Burkett, Esq.  
J. Gabriel Coggiola, Esq.  
Jeff Chandler, Esq.  
The Honorable Jenny Abbott Kitchings

WE WORK FOR THE PEOPLE WHO WORK.