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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
Workers' Compensation Commission

RECEIVED

JUL 26 2017

Appellate Case No. 2016-002266

SC Court of Appeals

Renee Robles, Employee, Claimant,Appellant,

v.

Party Reflections, Inc., Employer, and
Employers Assurance Company, Carrier,..... Respondents,

**RESPONDENTS' MOTION TO AMEND
INITIAL BRIEF AND
DESIGNATION OF MATTER**


TO THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS:

Respondents Party Reflections, Inc. and Employers Assurance
Company ("Respondents") respectfully move this Court for an Order
granting them leave to file Respondents' Amended Initial Brief and Amended
Designation of Matter in the above captioned matter.

The grounds for this motion are that Respondents' have identified additional case law that Respondents believe clarifies Respondents' argument and creates a clearer and more concise Designation of Matter.

Respondents greatly appreciate the Court's time, attention, and assistance with regard to this request.

Respectfully submitted,
COLLINS & LACY, P.C.

By: 
CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com
ASHLEY R. KIRKHAM
akirkham@collinsandlacy.com
KELSEY J. BRUDVIG
kbrudvig@collinsandlacy.com
1330 Lady Street, Suite 601
Post Office Box 12487
Columbia, South Carolina 29211
(803) 256-2660 (voice)
(803) 771-4484 (facsimile)

ATTORNEYS FOR RESPONDENTS

**RESPONDENTS' MOTION TO
AMEND INITIAL BRIEF AND
DESIGNATION OF MATTER**

Columbia, South Carolina
July 25, 2017

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v.

Party Reflections, Inc., Employer, and
Employers Assurance Company, Carrier,..... Respondents,

PROOF OF SERVICE

I hereby certify that I served **RESPONDENTS' MOTION TO AMEND INITIAL BRIEF and DESIGNATION OF MATTER** upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on July 25, 2017, addressed to the following:

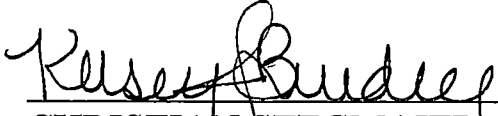
COUNSEL SERVED:

Stephen B. Samuels, Esquire
Samuels Law Firm, LLC
1320 Richland Street
Columbia, SC 29201
COUNSEL FOR APPELLANT

Mark R. Calhoun, Esquire
Calhoun Law Firm
714 East Main Street
Lexington, SC 29072
COUNSEL FOR APPELLANT

Respectfully submitted,

COLLINS & LACY, P.C.

By: 
CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com
ASHLEY R. KIRKHAM
akirkham@collinsandlacy.com
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**PROOF OF SERVICE -
RESPONDENTS' MOTION TO
AMEND INITIAL BRIEF AND
DESIGNATION OF MATTER**

Columbia, South Carolina
July 25, 2017



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

July 25, 2017

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

JUL 26 2017

SC Court of Appeals

Re: *Robles v. Party Reflections, Inc.*
Appellate Case No. 2016-002266
C&L File No. 001655-00857

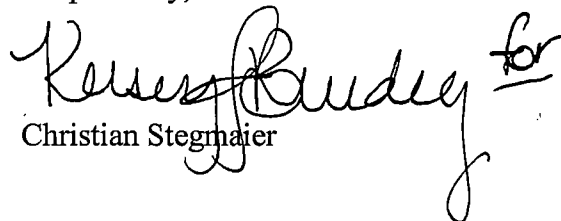
Dear Ms. Kitchings:

Please find enclosed the unbound originals and seven copies each of Respondents' Motion to Amend Their Initial Brief and Designation of Matter; Respondent's Amended Initial Brief; and Amended Designation of Matter in connection with the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the motion filing fee. Please file the originals and return one copy of each to us via our courier.

By copy of this letter to counsel of record, we are serving same on them.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,


Christian Stegmaier

CS/mmm

Enclosures

cc: Stephen B. Samuels, Esquire
Mark R. Calhoun, Esquire