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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III  
Circuit Court Judge, Second Judicial District

Civil Case No. 2015-CP-02-02389

Appellate Case No. 2017-002321

**RECEIVED**  
FEB 09 2018  
SC Court of Appeals

Edward Pugh

Appellant

v.

CB&I AREVA MOX SERVICES, LLC  
and Globalpundits Technology  
Consultancy, LLC

Respondents

MOTION TO SEAL CERTAIN DOCUMENTS IN THE  
DESIGNATION OF MATTER

Appellant Pro Se Edward Pugh respectfully requests this Court of Appeals for permission to seal certain documents in the Designation of Matter (DOM).

The basis of this Motion is that the 4 documents contain settlement discussions, proposed settlements, email correspondence between the Appellant's former attorney and Respondent's attorney and email correspondence between Appellant and Respondent's attorney.

These documents were filed in the Lower Court as sealed, confidential exhibits. The DOM numbered exhibits, and a brief reason why they were sealed and confidential, are as follows:

- 10. Plaintiff – Exhibit C, Specific Confidential Settlement Information from Plaintiff's Memorandum of February 15, 2017.

Reason: Emails between Appellant's former attorney and Respondent's attorney regarding continued settlement discussions.

19. Exhibit C, Confidential – Three (3) pages of a November 17, 2016 email thread between Plaintiff’s counsel Summerlin and Defense Counsel Christy (Landsdowne) Rogers from Plaintiff’s Memorandum of July 18, 2017;

Reason: This is the same Exhibit as in 10 above, and the same reason above.

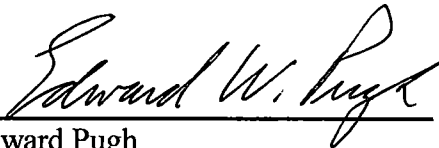
22. Exhibit F, Confidential – Two (2) page letter dated March 15, 2017 from Defense Counsel Carrouth to Plaintiff, with six (6) page attachment of “Settlement Agreement” signed by Plaintiff on November 11, 2016, and Three (3) page Order Denying Defendant’s Motion to Enforce Written Agreement = 11 pages

Reason: Email from Defendant’s attorney to Plaintiff with attachments, this is Plaintiff’s attempt to keep settlement discussions confidential.

23. Exhibit G, Confidential – Signed two (2) page September 30, 2016 “Agreement to Settle”;

Reason: Plaintiff’s attempt to keep settlement discussions confidential.

If the answer of the Court is to allow the above documents to be sealed, please direct how this should be done.

s/   
Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

Tuesday, February 6, 2018

Continued next page....

Other Counsel of Record:

Michael D. Carrouth  
c/o Fisher & Phillips, LLP  
PO Box 11612  
Columbia, South Carolina 29211  
Attorney for Respondent  
(803) 255-0000

Christina Landsdowne Rogers, Esquire  
Michelin North America, Inc.  
212 Cedar View Dr  
Irmo, South Carolina 29063  
Attorney for Respondent  
Phone number UNKNOWN

.....Motion to seal certain documents in designation of matter.

**PROOF OF SERVICE  
OF FILING THE MOTION TO SEAL DOCUMENTS IN THE  
DESIGNATION OF MATTER**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III  
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Case No. 2015-CP-02-02389,      Appellate Case No. 2017-002321

Edward Pugh

Appellant

v.

CB&I AREVA MOX SERVICES, LLC  
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Consultancy, LLC

Respondents

**PROOF OF SERVICE**

I certify that I have served the **Motion to Seal Certain Documents in the Designation of Matter (DOM)** on CB&I AREVA MOX SERVICES, LLC and Globalpundits Technology Consultancy, LLC by depositing a copy of it in the United States Mail, postage prepaid, on February 5, 2018, addressed to their attorneys of record, Michael D. Carrouth c/o Fisher & Phillips, LLP, PO Box 11612, Columbia, South Carolina 29211 and Christina Landsdowne Rogers, Esquire, c/o Michelin North America, Inc, 212 Cedar View Dr, Irmo, South Carolina, 29063.

Tuesday, February 6, 2018

*Edward W. Pugh*  
s/ Edward W. Pugh  
Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

**LETTER TO THE APPELLATE COURT CLERK-  
FILING THE MOTION TO SEAL DOCUMENTS IN THE  
DESIGNATION OF MATTER**

Tuesday February 6, 2018

**VIA Certified U.S. Mail**

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

**RECEIVED**  
FEB 09 2018  
SC Court of Appeals

RE: Filing - Motion to Seal Documents in the Designation of Matter

Edward Pugh, Appellant vs CB&I AREVA MOX Services LLC, and  
Globalpundits Technology Consultancy, LLC Respondents.

Civil Case No.: 2015-CP-02-02389, Appellate Case No. 2017-002321

Dear Ms. Kitchings:

Sent by Certified U.S. mail to the Court for filing is a **Motion to Seal  
Certain Documents in the Designation of Matter (DOM)** in the above case.

Also sent are the following:

- (1) Proof of Service of the above filing on the Respondents.
- (2) A filing fee of \$25 in the form of a Money Order payable to SC Court of Appeals.

The basis of this Motion is to ask the Court for its permission to seal certain documents that are listed in the DOM. These documents were filed in the Lower Court as sealed, confidential exhibits.

If you need anything else or I can otherwise be of any assistance, please feel free to contact me.

Sincerely,

*Edward W. Pugh*  
s/ Edward W. Pugh

Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

Continued next page.....

cc: Michael D. Carrouth  
c/o Fisher & Phillips, LLP  
PO Box 11612  
Columbia, South Carolina 29211  
Attorney for Respondent  
(803) 255-0000

Christina Landsdowne Rogers, Esquire  
Michelin North America, Inc.  
212 Cedar View Dr  
Irmo, South Carolina 29063  
Attorney for Respondent  
Phone number UNKNOWN

....letter to Clerk of Court of Appeals.

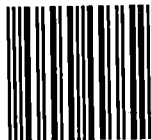


www.democrats.org

Edward Pugh  
1085 Old Clemson Hwy. Ste. E.  
Seneca, SC 29672-8029



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**The Honorable**  
**Jenny Abbott Kitchings**  
Clerk of Court – Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

FEB 09 2018

SC Court of Appeals

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