

**FORM 14**  
**REPLY DESIGNATION OF MATTER TO BE**  
**INCLUDED IN THE RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

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

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Case No. 2015-CP-02-02389

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Appellate Case No. 2017-002321

**RECEIVED**  
MAR 08 2018  
SC Court of Appeals

Edward Pugh

Appellant

v.

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

Respondents

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

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Plaintiff, Appellant – Edward Pugh  
Defendants, Respondents – CB&I AREVA MOX Services, LLC and  
Globalpundits Technology Consultancy, LLC

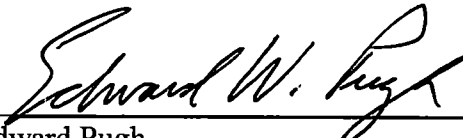
Continued on next page for clarity....

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

1. Letter of Demand from Plaintiff Pugh to MOX Services, August 19, 2015;  
Event – 30(b)(6) Deposition Sept. 29, 2016  
Event – Mediation Sept. 30, 2016
2. Transcript 30(b)(6) Deposition of Deborah Alderman, October, 2016;
3. Order/Form 4 – Order Granting Continuance  
(& Consent Motion for Continuance (no date), October 4 & 17, 2016;

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

Monday, March 5, 2018

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

**PROOF OF SERVICE  
OF FILING THE APPELLANT'S REPLY BRIEF AND  
REPLY DESIGNATION OF MATTER TO BE INCLUDED IN  
THE RECORD ON APPEAL**

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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SC Court of Appeals

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

Edward Pugh

Appellant

v.

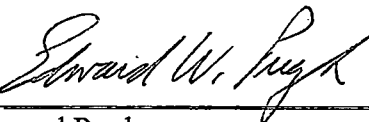
CB&I AREVA MOX SERVICES, LLC  
and Globalpundits Technology  
Consultancy, LLC

Respondents

**PROOF OF SERVICE**

I certify that I have served the **Appellant's Reply Brief and Reply Designation of Matter to be Included in the Record on Appeal (DOM)** on CB&I AREVA MOX SERVICES, LLC and Globalpundits Technology Consultancy, LLC by depositing a copy of it in the United States Mail, certified postage prepaid, on March 5, 2018, addressed to their attorneys of record, Michael D. Carrouth and Benjamin Dudek, Fisher & Phillips, LLP, PO Box 11612, Columbia, South Carolina 29211.

Monday, March 5, 2018

s/ 

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 APPELLANT'S REPLY BRIEF AND  
REPLY DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

Monday March 5, 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**  
MAR 08 2018  
SC Court of Appeals

RE: Filing -- Appellant's Reply Brief and Reply 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 the Appellant's **Reply Brief and Reply Designation of Matter to be Included in the Record on Appeal** in the above case. I am responding to the Respondents Initial Brief and their Designation of Matter postmarked on Wednesday February 21, 2018. Also sent is the following:

- (1) Proof of Service of the above filing on the Respondents.

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

Sincerely,

sl.



  
Edward Pugh

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

cc: Michael D. Carrouth and  
Benjamin Dudek  
c/o Fisher & Phillips, LLP  
PO Box 11612,  
Columbia, South Carolina 29201  
Attorneys for Respondent  
(803) 255-0000

**P** Edward Pugh  
1085 Old Clemson Hwy, Ste. F.  
Seneca, SC 29672-8029

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS; FOLD AT DOTTED LINE.  
**CERTIFIED MAIL**  
  
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**RECEIVED**  
MAR 08 2018  
SC Court of Appeals

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

**first class**

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