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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APR 02 2018
SC 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

Edward Pugh

Appellant

v.

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

Respondents

MOTION TO AMEND THE REPLY DESIGNATION OF MATTER (DOM)

After a post filing review by the Appellant, it was discovered that the Reply DOM containing "Letter of Demand from Plaintiff Pugh to MOX Services" and "Transcript 30(b)(6) Deposition of Deborah Alderman" is matter that was not presented to the lower court per Rule 210 (c) Content. Therefore, Appellant motions the Court to allow amendment of the Reply DOM by removing these two matters.

The Respondents were contacted on March 28, 2018 by email and do not consent to this Motion, but neither do they oppose it. The amended Reply DOM is attached for filing.

Edward W. Pugh
s/ _____

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

Thursday, March 29, 2018

Continued next page....

Other Counsel of Record:

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

.....Motion to amend the reply designation of matter.

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

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

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

1. 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.

Thursday, March 29, 2018

Edward W. Pugh
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 MOTION TO AMEND THE REPLY
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
Circuit Court Judge, Second Judicial District

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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
and Globalpundits Technology
Consultancy, LLC

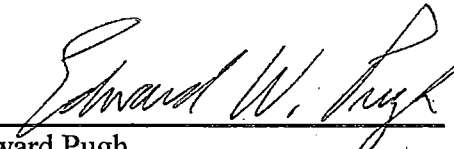
Respondents

PROOF OF SERVICE

I certify that I have served the **Motion to Amend the Reply 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 March 29, 2018, addressed to their attorneys of record, Michael D. Carrouth and Benjamin Dudek, c/o Fisher & Phillips, LLP, PO Box 11612, Columbia, South Carolina 29211.

Thursday, March 29, 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 MOTION TO AMEND THE REPLY
DESIGNATION OF MATTER**

Thursday, March 29, 2018

VIA FAX 803-734-1839 and Certified U.S. Mail

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

RE: Filing - Motion to Amend the Reply Designation of Matter

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

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

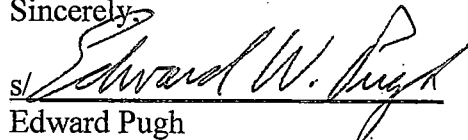
Dear Ms. Kitchings:

Sent by Certified U.S. mail and FAX to the Court for filing is a **Motion to Amend the Reply 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 by Money Order payable to SC Court of Appeals.
- (3) Amended Reply Designation of Matter

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

Sincerely,


s/ Edward W. Pugh

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 29211
Attorney for Respondent
(803) 255-0000

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



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PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL



7017 2680 0000 6480 0601

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

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