

90086

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2016-002266

RECEIVED
JUN 21 2019
SC Court of Appeals

Renee Robles, Employee, Claimant, Appellant,

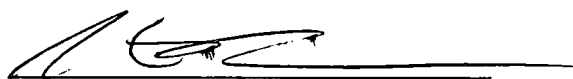
v.

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

MOTION FOR COSTS AND ATTORNEYS FEES

Petitioner, by and through his undersigned attorney, hereby moves this Honorable Court for costs and attorney's fees in the amount of \$3,821.99 to be assessed against Respondents pursuant to Rule 222 SCACR, and as shown by attached itemized statement of costs. As grounds for this motion, Petitioner would show this Court **affirmed in part, reversed in part and remanded** the decision of the South Carolina Workers' Compensation Commission.

Respectfully Submitted,



Stephen B. Samuels
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000

Mark R. Calhoun
CALHOUN LAW FIRM
714 East Main Street
Lexington, SC 29072
(803) 957-8401

Attorneys for Appellant

Columbia, South Carolina
June 21, 2019

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2016-002266

RECEIVED
JUN 21 2019
SC Court of Appeals

Renee Robles, Employee, Claimant, Appellant,

v.

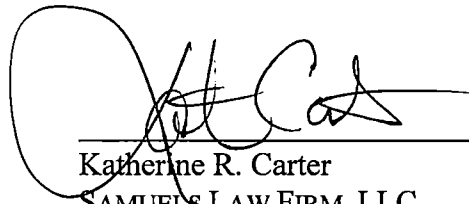
Party Reflections, Inc., Employer, and
Employers Assurance Company, Carrier, Respondents.

PROOF OF SERVICE

I certify that I, Katherine Carter, am a paralegal to Stephen B. Samuels and I have caused the **Motion for Costs and Attorneys Fees** to be served on the parties below, by placing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on June 21, 2019, addressed as follows:

Ashley R. Kirkham, Esq.
Christian Stegmaier, Esq.
Kelsey J. Brudvig, Esq.
Collins and Lacy, P.C.
P.O. Box 12487
Columbia, SC 29211

June 21, 2019



Katherine R. Carter
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000



STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

June 21, 2019

RECEIVED
JUN 21 2019
SC Court of Appeals

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: Renee Robles v. Party Reflections, Inc. and Employers Assurance Co.
Appellate Case No.: 2016-002266

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven copies of **Motion for Costs and Attorneys Fees** in the above-referenced appeal. I have also enclosed our firm's check in the amount of Fifty (\$50.00) Dollars as payment of the required filing fee. Please have your staff date stamp an extra copy of the Motion, and return a clocked copy to our courier.

By copy of this letter and enclosure to Ashley Kirkham, Christian Stegmaier, and Kelsey Brudvig, counsel of record for the Respondents, we are serving them with a copy of our **Motion for Costs and Attorneys Fees** as indicated by the attached Proof of Service.

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: Ashley R. Kirkham, Esq.
Christian Stegmaier, Esq.
Kelsey J. Brudvig, Esq.
Mark R. Calhoun, Esq.

WE WORK FOR THE PEOPLE WHO WORK.