THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission
WCC File No. 0906322

Case Tracking No. 2012-210889

Henry Brown, ... Appellant,

v.

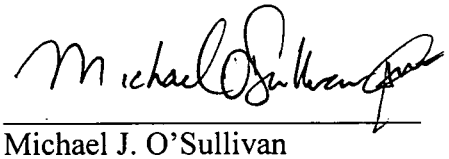
Peoplease Corp, and Arch Insurance Company
c/o Gallagher Bassett Services Incorporated. .....Respondents.

APPELLANT'S RETURN TO RESPONDENT'S
REVISED MOTION TO STRIKE AND/OR
REVISE FINAL BRIEF OF APPELLANT

Appellant opposes Respondent's revised motion to strike and/or revise final brief of Appellant. Appellant believes he has fully complied with Rule 211, SCACR. Unfortunately, Respondent has provided no specific instances of impropriety for Appellant to address. Respondent has simply listed four different page numbers without citing a specific instance of Appellant's violation of Rule 211, SCACR. Appellant has reviewed the language on those pages cited by Respondent and can see no substantive corrections or revisions from Appellant's initial brief. Simply stated, it is impossible for Appellant to respond to Respondent's motion when it fails to cite any instances of impropriety under Rule 211, SCACR. Appellant would submit that unless Respondent has provided additional documentation to the Court which has not been provided to Appellant, the Court would be unable to address Respondent's motion as well. Appellant believes no specific instances of impropriety are cited by Respondent because no

such impropriety exists in Appellant's brief.

Appellant believes this motion to be frivolous and requests that this motion be denied and/or dismissed for vagueness. Due to the frivolous nature of Respondent's motion, Appellant requests an award of the costs and attorneys fees associated with defending against this motion pursuant to Rule 269, SCACR.



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Attorney for Appellant

February 1, 2013

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PROOF OF SERVICE

I certify that I have served the Appellant's Return to Respondent's Revised Motion to Strike and/or Revise Final Brief of Appellant on the parties in the above referenced claim by depositing a copy of it in the Unites States Mail to their respective attorneys of record, postage prepaid, on February 1, 2013 addressed as follows:

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February 1, 2013