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MAR 30 2020

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE SC WORKERS COMPENSATION COMMISSION

Gene McCaskill, Commissioner  
Melody L. James, Commissioner  
R. Michael Campbell, II, Commissioner

Case No. 1423018

Giles Long.....Claimant, Appellant/Respondent

v.

Metro Construction, Inc., Employer, and  
American Zurich Ins. Co. and The  
SC Uninsured Employers' Fund.....Carrier, Defendants

of which Metro Construction, Inc. Employer, and  
The SC Uninsured Employers' Fund, Carrier are.....Respondents/Appellants

and American Zurich Ins. Co.....Respondent

MOTION TO AMEND FINAL BRIEF OF APPELLANT

Pursuant to Rule 240 and Rule 263 of the South Carolina Appellate Court Rules,  
Claimant, Appellant/Respondent, Giles Long, respectfully requests to amend the Final Brief of  
the Appellant. The request is necessary to comply with South Carolina Appellate Court Rule  
208 and Rule 211. All Parties consent to this motion.

Respectfully submitted,

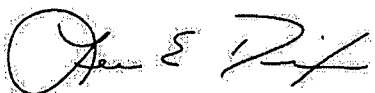


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Nicholas G. Callas, S.C. Bar#15193  
Law Office of Nicholas G. Callas, PA  
1901 Gadsden Street, Suite B  
Columbia, South Carolina 29201  
(803) 369-3968  
nick@callaslawfirm.com  
Attorney for Claimant, Appellant/Respondent

March 30, 2020

I Consent:

A handwritten signature in black ink, appearing to read "Lee Dixon", written over a horizontal line.

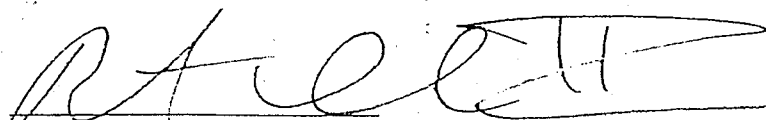
Lee Dixon, Esquire  
Hedrick Gardner Kincheloe & Garofalo, L.L.P.  
1230 Main Street, Suite 325  
Columbia, SC 29201

I Consent:

A handwritten signature in black ink, appearing to read 'Timothy B. Killen', written over a horizontal line.

Timothy B. Killen, Esquire  
Holder Padgett Littlejohn & Prickett, LLC  
349 West Coleman Boulevard, Suite 300  
Mt. Pleasant, SC 29464

I Consent:

A handwritten signature in black ink, appearing to read 'R. C. Cook', written over a horizontal line.

Robert C. Cook, Esquire  
The Robert Cook Law Firm, LLC  
128 North Oak Street, Batesburg, SC 29006

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SC Court of Appeals

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**Certificate of Service**

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I certify that I have served the Motion to Amend Final Brief of the Appellant upon all parties by depositing a copy of it in the United States Mail, postage prepaid, on March 30, 2020, to the Counsel of Record, as listed below:


Lee Dixon, Esquire  
Hedrick Gardner Kincheloe & Garofalo, L.L.P.  
1230 Main Street, Suite 325  
Columbia, SC 29201

Timothy B. Killen, Esquire  
Holder Padgett Littlejohn & Prickett, LLC  
349 West Coleman Boulevard, Suite 300  
Mt. Pleasant, SC 29464

Robert C. Cook, Esquire  
The Robert Cook Law Firm, LLC  
128 North Oak Street, Batesburg, SC 29006

And I certify that I have served the Motion to Amend Final Brief of the Appellant upon the South Carolina Workers' Compensation Commission by depositing a copy of it in the United States Mail, postage prepaid, on March 30, 2020, as listed below:

Amy Bracy, Judicial Director  
S.C. Workers' Compensation Commission  
P.O. Box 1715  
Columbia, SC 29202-1715

  
\_\_\_\_\_  
Nicholas G. Callas



L A W O F F I C E O F

Nicholas G. Callas P.A.

1901 Gadsden Street  
Suite B  
Columbia, SC 29201

P: 803.369.3968  
F: 803.862.1002  
www.scdisabilitylawyer.com  
nick@callaslawfirm.com

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Giles Long v. Metro Construction, Inc.  
Appellate Case No.: 2019-000897

Dear Ms. Abbott:

I represent Giles Long in the above referenced case. Enclosed herewith please find our Motion to Amend the Final Brief of the Appellant with Certificate of Service.

I appreciate your assistance.

Sincerely,

Nicholas G. Callas

cc: Lee E. Dixon, Esquire  
Timothy B. Killen, Esquire  
Robert C. Cook, II, Esquire  
Amy Bracy, Judicial Director, SCWCC