

94805

RECEIVED

OCT 07 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2018-000965

Victor G. Benjamin, Claimant, Appellant,

v.

Rexam Beverage Can Company d/b/a Rexam Beverages, Employer,
and Hartford Insurance Company of the Midwest, Carrier, Respondents.

MOTION FOR COSTS AND ATTORNEYS FEES

Appellant, by and through his undersigned attorney, hereby moves this Honorable Court for costs and attorney's fees in the amount of \$5,215.28 to be assessed against Respondents pursuant to Rules 222 and 242, SCACR, and as shown by attached itemized statement of costs. As grounds for this motion, Appellant would show this Court **reversed** the Decision and Order of the South Carolina Workers' Compensation Commission.

Respectfully submitted,



Stephen B. Samuels
SAMUELS LAW FIRM, LLC
1320 Richland St
Columbia, SC 29201
(803) 779-4000
stephen@samuelslawfirm.net

Jeff C. Chandler
CHANDLER LAW FIRM
Bank of America Building
2501 North Oak Street
Myrtle Beach, SC 29577
(843) 448-4357
jeffcchandler@aol.com

October 4, 2021

ATTORNEYS FOR APPELLANT

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

OCT 07 2021

SC Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2018-000965

Victor G. Benjamin, Employee, Appellant,

v.

Rexam Beverage Can Company d/b/a Rexam Beverages, Employer, and
Hartford Insurance Company of the Midwest c/o Sedgwick CMS, Carrier, Respondents.

PROOF OF SERVICE

I certify that I, Wanda Powell, 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, via electronic service on October 4, 2021, addressed as follows:

Jason W. Lockhart, Esq.
McAngus Goudelock & Courie, LLC
P.O. Box 12519
Columbia, SC 29211
Via email: jlockhart@mgclaw.com

Helen F. Hiser, Esq.
McAngus Goudelock & Courie, LLC
P.O. Box 650007
Mt. Pleasant, SC 29465
Via email: helen.hiser@mgclaw.com

October 4, 2021



Wanda Powell
SAMUELS REYNOLDS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000



STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

October 4, 2021

RECEIVED

OCT 07 2021

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: Victor G. Benjamin v. Rexam Beverage Can Company, et al.
Appellate Case No.: 2018-000965

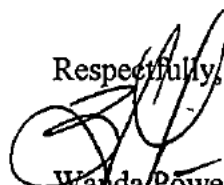
Dear Ms. Kitchings:

Enclosed for filing please find our **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 Jason W. Lockhart and Helen F. Hiser, 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

Respectfully,

Wanda Powell
Paralegal to Stephen B. Samuels

/wp
Enclosure(s) as stated

cc: Jason W. Lockhart, Esq.
Jeff Chandler, Esq.
Helen F. Hiser, Esq.

WE WORK FOR THE PEOPLE WHO WORK

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSREYNOLDS.COM



1320 RICHLAND STREET
COLUMBIA, SC 29201

RECEIVED
OCT 07 2021
SC Court of Appeals

COLUMBIA
SC 29201
OCT 04 2021
PM 1:51



UNITED STATES POSTAGE
PITNEY BOWES
02 1P \$ 000.73⁰
0001963503 OCT 04 2021
MAILED FROM ZIP CODE 29201

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

29201-376999

