

**In The South Carolina Court of Appeals  
On Appeal Form the South Carolina Workers' Compensation Commission  
Appellate Case No: 2019-001936**

**RECEIVED**

**Mar 25 2022**

**SC Court of Appeals**

**Jennie Cox, Employee**

**Appellant,**

**v.**

**Appellate Case No: 2019-001936**

**Palmetto State Transportation, Employer  
And Cherokee Insurance Company,  
Respondents**

**MOTION FOR LEAVE TO AMEND AND SUBSTITUTE ROA AND APPELLANTS FINAL BRIEF**

**Undersigned Counsel would respectfully show unto this Court:**

1. Counsel for Appellant recently corrected certain deficiencies in Appellant's most recent filings pursuant to the Court's instructions and prepared the documents for resubmission.
2. Upon inspection of the reprinted documents, however, Counsel for Appellant discovered certain other deficiencies in the corrected documents aside from those previously noted by the Court, including; difficult to read and/or improper pagination requiring correction in the Record on Appeal, poor quality copies of certain medical records included in the Record on Appeal due, in part, to errors in converting hard copies of certain documents to Portable Document Format (pdf.), and certain formatting errors and missing citations to the ROA in Appellant's originally submitted Final Brief, which occurred due to previously unnoted file corruption.
3. Counsel for Appellant has taken steps to correct the previously submitted filings to the extent possible. Although the appearance of some poor-quality copies could not be fully corrected, Counsel is informed and believes that all documents referenced directly by either party are fully legible and can be reviewed with no significant difficulties.
4. Counsel warrants that no substantive changes to the originally submitted versions of Appellant's Final Brief and Record on Appeal have been made beyond the changes noted herein and those made at the Court's direction.
5. Counsel's discovery of and efforts to address the additional deficiencies noted above caused Counsel to have to submit the documents for professional printing and binding on three separate occasions which, in turn, has caused Counsel to submit the documents a few days beyond the date the Court instructed that the corrected documents should be resubmitted.
6. Counsel has made arrangements for the expedited delivery of the corrected documents to the Court at The Calhoun Building, 1220 Senate Street, South Carolina, 29201.
7. In light of all of the above, Counsel requests that the Court accept and substitute the corrected versions of the Appellant's Final Brief and Record on Appeal in the place of previously submitted versions of the same documents.

8. This motion is not being made for purposes of delay; rather, the request has been necessitated by the circumstances set forth above.

Accordingly, Appellant requests that the Court allow for the substitution of Appellant's original Final Brief and Record on Appeal with the corrected versions of the same.

/s/ Adrienne L. Turner

Adrienne L. Turner

Bar # 6840

Counsel for Appellant

Greenville, SC

March 25, 2022

**RECEIVED**

**Mar 25 2022**

**SC Court of Appeals**

**CERTIFICATE OF SERVICE**

**I certify that a true and correct copy of the Motion to Amend/Substitute Filings was sent by Electronic Mail and/or by United States Mail, postage prepaid, on March 25, 2022 to:**

George Gallagher, Esquire  
ggallagher@speed-seta.com  
PO Box 11669  
Columbia, SC 29211

/s/Adrianne L. Turner

Adrianne L. Turner

RECEIVED

Mar 25 2022

SC Court of Appeals

TURNER LAW, LLC

PO Box 210638

Columbia, SC 29221

Telephone: (803) 467-8687

[aturner@turnerlawsc.com](mailto:aturner@turnerlawsc.com)

Facsimile: (803) 271-0451

---

March 25, 2022

The Honorable Claire Allen  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Jenny Cox v. Palmetto State Transportation – Appellate Case No. 2019-001936

Dear Ms. Allen:

Please find enclosed herein a copy of Appellant's Motion to Amend and Substitute Appellant's Final Brief and Record on Appeal. Please also find enclosed a check in the amount of \$50.00 to cover the cost of filing the Motion.

By copy of this letter, I am serving the same on Respondent's counsel of record, George Gallagher.

With kind regards, I am

Sincerely,

*/s/ Adrienne L. Turner*

Adrienne L. Turner

cc: George Gallagher