

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION  
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

FULL COMMISSION REVIEW

Commissioner Melody James  
Commissioner Andrea Roche  
Commissioner T. Scott Beck

RECEIVED

MAY 20 2013

SC Court of Appeals

Appellate Case No.: 2013-000599

WCC File No.: 1113278

Gary Jeter, Jr., Employee.....Respondent

vs.

All My Sons Moving & Storage, Inc., Employer.....Respondent

- and -

Hartford Insurance Company  
of the Midwest, Carrier.....Appellant

- and -

ULLICO Casualty Company, Carrier.....Respondent

212  
5/20  
5/30


APPELLANT'S NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME IN  
WHICH TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER

TO: Jenny Abbott Kitchings, Clerk of Court for the South Carolina Court of Appeals; The Honorable Virginia L. Crocker, Judicial Director of the South Carolina Workers' Compensation Commission; and Peter Dworjanyn, Attorney for ULLICO Insurance Company, Carrier:

YOU WILL PLEASE TAKE NOTICE THAT pursuant to Appellate Court Rule 240, Appellants, All My Sons Moving & Storage, and its worker's compensation carrier, Hartford Insurance Company of the Midwest, hereby move for an extension of time in which to file Appellants' Initial Brief and Designation of Matter in the above referenced matter. Parties to this action are attempting to resolve the issues on appeal, which may obviate the need for Appellate review. Also, Peter H. Dworjany, attorney for Respondent, ULLICO Casualty Company, has no objection to Appellant's request for a ten (10) day extension.

Hence, Appellants respectfully request an additional ten (10) days in which to finalize and serve the Appellants' Initial Brief and Designation of Matter upon opposing counsel and the Court. Therefore, Appellants request permission to file the Initial Brief and Designation of Matter with the Court on or before Monday, May 30, 2013.

Respectfully submitted,

By: 

Vernon F. Dunbar, Bar No. 7836  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1509  
Greenville, SC 29601  
Telephone No.: 864-552-4601  
Email: vdunbar@turnerpadgett.com

Greenville, South Carolina

May 20, 2013

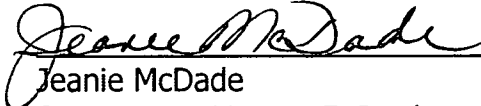
**CERTIFICATE OF SERVICE**

The undersigned certifies that she is an employee at TURNER, PADGET, GRAHAM & LANEY, P.A., and that the attached *Notice of Motion and Motion for Extension of Time in Which to file Appellants' Initial Brief and Designation of Matter and Certificate of Service* were served upon Pete Dworjanyn, Esquire, attorney for ULLICO, this 20th day of May 2013, in accordance with Regulations 67-210, 67-211, 67-213, 67-214, and 67-215 and such other law as may be applicable by U.S. mail, addressed to:

The Honorable Virginia L. Crocker, Judicial Director  
SC Workers' Compensation Commission  
P. O. Box 1715  
Columbia, SC 29202-1715

Linda McKenzie, Esquire  
Bowen McKenzie & Bowen  
Post Office Box 2547  
Greenville, SC 29602

Pete Dworjanyn, Esquire  
Collins & Lacy  
1330 Lady Street, 6<sup>th</sup> Floor  
Columbia, SC 29201

  
\_\_\_\_\_  
Jeanie McDade  
Secretary to Vernon F. Dunbar