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Jul 15 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS'
COMPENSATION COMMISSION

Appellate Case No. 2022-000067

KYLE R. BAGLEY, Employee..... Appellant,

v.

JN FIBERS, INC., D/B/A SUN FIBER, LLC, Employer, and
GREAT AMERICAN INSURANCE COMPANY, Carrier..... Respondents.

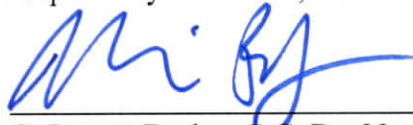
RESPONDENTS' MOTION FOR EXTENSION OF TIME
TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 240, SCACR, Respondents JN Fibers, Inc., d/b/a Sun Fiber, LLC, and Great American Insurance Company hereby move for an extension of time to file and serve Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal. These filings are currently docketed for submission on or before July 18, 2022. Respondents respectfully request an extension of thirty (30) days to file and serve their Initial Brief and Designation of Matter, which would then be due on or before August 17, 2022.

The grounds for this motion are that other pending professional obligations and scheduling conflicts have created a need for additional time to prepare the Initial Brief and Designation of Matter. This motion is not being made for the purpose of delay. Respondents have notified counsel for Appellant of their intent to make this request and counsel for Appellant does not oppose this extension. This is the first request for an extension by Respondents.

Therefore, Respondents request an extension of time until August 17, 2022, to file and serve their Initial Brief and Designation of Matter.

Respectfully submitted,



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Attorneys for Respondents

Columbia, South Carolina

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v.

JN FIBERS, INC., D/B/A SUN FIBER, LLC, Employer, and
GREAT AMERICAN INSURANCE COMPANY, Carrier..... Respondents.

PROOF OF SERVICE

I certify that I have served the **RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** by depositing a copy of it in the United States Mail, postage prepaid, on July 15, 2022, addressed to the Appellant's Attorney of Record, Bryan N. Sanchez, Esq., Lewis Law Firm, LLC, PO Box 11583, Rock Hill, South Carolina 29731 and via email at bryan.sanchez@stacylewislaw.com.

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Attorneys for Respondents

Columbia, South Carolina
July 15, 2022

July 15, 2022

VIA US-MAIL AND EMAIL TO:

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina Court of Appeals
Calhoun Building
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RECEIVED
Jul 15 2022
SC Court of Appeals

Re: Kyle R. Bagley v. Sun Fiber, LLC, and Great American Alliance Insurance Company
Appellate Case No.: 2022-000067
Date of Accident: June 14, 2019

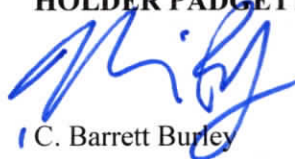
Dear Ms. Kitchings:

Enclosed for filing is the original, and seven (7) copies, of the **RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** in the above-referenced case, along with a **PROOF OF SERVICE** that one (1) copy was served on the Appellant (via their Counsel of Record Bryan N. Sanchez). Please accept this for filing and kindly return one (1) clocked copy of this to my office (I have enclosed a postage pre-paid envelope for your convenience when returning this to me.). We have also enclosed the required Fifty Dollar and 00/100 Cents (\$50.00) filing fee.

If you have any questions, or if you need further assistance from us, please do not hesitate to call.

Respectfully,

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC



C. Barrett Burley

CBB/swk

Enclosures

cc: Liz Hsu, JN Fibers Inc d/b/a Sun Fiber, LLC (via email)
Amado Azua Jr., JN Fibers Inc d/b/a Sun Fiber, LLC (via email)
Bryan N. Sanchez, Esquire, Lewis Law Firm (via email and US-Mail)
Tearsa D. White, Strategic Comp (via fax)