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**Aug 16 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION

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Appellate Case No. 2022-000067

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

v.

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

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RESPONDENTS' SECOND MOTION FOR EXTENSION OF TIME

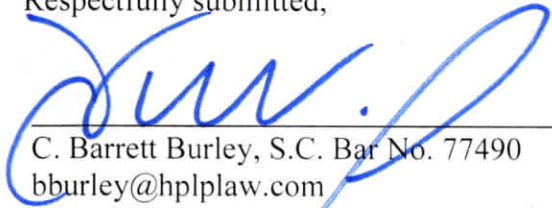
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Pursuant to Rule 240, SCACR, Respondents JN Fibers, Inc., d/b/a Sun Fiber, LLC, and Great American Insurance Company hereby move for an extension of time to file and serve Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal. These documents were due originally to be filed by Respondents on July 18, 2022. Counsel sought and was granted an extension of this deadline, and the Initial Brief and Designation are now due to be filed on August 17, 2022.

At present, counsel is under an unusually heavy litigation schedule and will be unable to complete these documents by the August 17 deadline. Accordingly, counsel respectfully moves for a twenty-day extension in which to file and serve the Respondent's Initial Brief and Designation of Matter, which would then be due on or before September 6, 2022.

Therefore, Respondents request an extension of time until September 6, 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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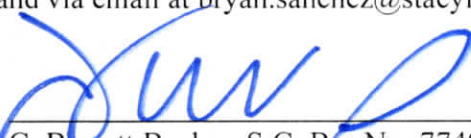
KYLE R. BAGLEY, Employee..... Appellant,

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' SECOND MOTION FOR EXTENSION OF TIME** by depositing a copy of it in the United States Mail, postage prepaid, on August 16, 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](mailto:bryan.sanchez@stacylewislaw.com).



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August 16, 2022

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SC Court of Appeals

**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](mailto:ctappfilings@sccourts.org)

**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**

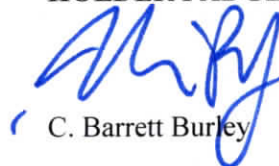
Dear Ms. Kitchings:

Enclosed for filing is the original, and seven (7) copies, of the **RESPONDENTS' SECOND 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)