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Sep 26 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION
WCC File No. 1908703
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.

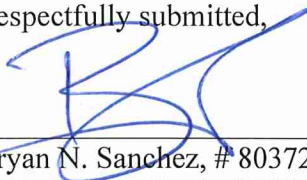
APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE AND SERVE APPELLANT'S REPLY BRIEF

Pursuant to Rule 240, SCACR, Appellant Kyle R. Bagley, hereby move for an extension of time to file and serve Appellant's Reply Brief. This filing is currently docketed for submission on or before September 26, 2022. Appellant respectfully request an extension of thirty (30) days to file and serve his Reply Brief which would then be due on or before October 26, 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 Reply Brief. This motion is not being made for the purpose of delay. Appellant has notified counsel for Respondents of his intent to make this request and counsel for Respondents does not oppose this extension. This is the first request for an extension by Appellant.

Therefore, Appellant requests an extension of time until October 26, 2022, to file and serve his Reply Brief.

Respectfully submitted,



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Attorneys For Appellant

Rock Hill, South Carolina

September 22, 2022

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KYLE R. BAGLEY, Employee-Claimant, Appellant,

v.

JN FIBERS INC D/B/A SUN FIBER, LLC, Employer-Defendant, Respondent,

AND

GREAT AMERICAN INSURANCE COMPANY, Defendant-Carrier, Respondent(s).

PROOF OF SERVICE

I certify that I have served the **APPELLANT'S MOTION FOR EXTENSION OF TIME FILE AND SERVE APPELLANT'S REPLY BRIEF** by depositing a copy of it in the United States Mail, postage prepaid, on September 22, 2022, addressed to the Respondents' Attorney of Record as follows:

Barrett Burley, Esq.,
Holder Padgett Littlejohn & Prickett, LLC
bburley@hplplaw.com
Attorney for Respondents

LEWIS LAW FIRM, LLC

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September 22, 2022.

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E. Stacy Lewis
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*Licensed in NC & SC
Attorneys-at-Law

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SC Court of Appeals

VIA US-MAIL AND EMAIL TO:

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
P.O. Box 11629, Columbia, SC 29211
CTAppfilings@SCCourts.org

RE: Kyle R. Bagle v. Sun Fiber, LLC, and Great American Alliance Insurance Company
Appellate Case No.: 2022-000067
Date of Accident: June 14, 2009

Dear Ms. Kitchings:

Attached please find the **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE AND SERVE APPELLANT'S REPLY BRIEF** in the above-referenced case, along with a **PROOF OF SERVICE** that one (1) copy was served on the Respondents (via their Counsel of Record, C. Barrett Burley). Please accept this for filing and note that the hard copy of the original along with seven (7) copies of the above-referenced motion and proof of service are being simultaneously mailed via the United States Postal Service, upon receipt of same, please kindly return one (1) clocked copy of this to my office (a pre-paid self-addressed envelope is enclosed). The Fifty Dollar and 00/100 Cents (\$50.00) filing fee is also enclosed.

Please advise if there is anything further required of Appellant in connection herewith. Should you have any questions or concerns, please do not hesitate to contact me. Thank you in advance for your time and assistance with this matter.

Sincerely,



Nicholas J.A. Stark,
Attorney

NS/jl

Enclosures (as stated)

CC: C. Barrett Burley, Esq., Holder Padgett Littlejohn & Prickett, LLC
bburley@hplplaw.com