

RECEIVED

Oct 21 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

---

Appeal No. 2022-000864

---

William D. Downes, Employee ..... Respondent,

v.

Bon Secours Mercy Health, Inc., Employer,  
Safety National Casualty Corporation, Carrier, ..... Appellants.

---

**MOTION FOR EXTENSION OF TIME**

---

Pursuant to Rules 240 and 263(b), SCACR, Appellants Bon Secours Mercy Health, Inc. and Safety National Casualty Corporation hereby move for an extension of time in which they must file their Initial Brief and Designation of Matter. Appellants require this extension due to other deadlines falling around the same time, as well as impending eye surgery scheduled for Appellants' counsel. Appellants' Initial Brief and Designation of Matter currently are due on November 3, 2022 and, with the 30-day extension, will be due on December 5, 2022. This is Appellants' first request for an extension.

Respectfully submitted,

MCANGUS GOUDELCK & COURIE, LLC

October 21, 2022

s/Helen F. Hiser  
Helen F. Hiser, S.C. Bar No.: 76124

735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Appellants Bon Secours Health  
System, Inc. and Safety National Casualty  
Corporation*

RECEIVED

Oct 21 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

Appeal No.: 2022-000864

William D. Downes, Employee ..... Respondent,

v.

Bon Secours Health System, Inc., Employer,  
Safety National Casualty Corporation, Carrier, ..... Appellants.

**PROOF OF SERVICE**

I certify that I have served Appellants' **Motion for Extension of Time** on William D. Downes, by emailing it to his attorneys of record as follows:

Donald E. Kamb, Jr., Esq.  
Williams & Kamb, LLC  
P.O. Box 10693  
Greenville, South Carolina 29603-0693  
(864) 235-6254  
dkamb@williamskamb.com

Joe Mooneyham, Esq.  
Mooneyham Berry, LLC  
P.O. Box 8359  
Greenville, South Carolina 29604  
(864) 421-0036  
joe@mbllc.com

*Attorneys for Respondent William D. Downes*

MCANGUS GOUDELICK & COURIE, LLC

October 21, 2022

By: s/Helen F. Hiser

Helen F. Hiser  
S.C. Bar No.: 76124  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900  
*Attorneys for Appellants Bon Secours Health  
System, Inc. and Safety National Casualty  
Corporation*



**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

**RECEIVED**

**Oct 21 2022**

**SC Court of Appeals**

October 21, 2022

**Via S.C. Courts E-filing**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: William Downes v. Bon Secours Mercy Health and Bon Secours Health System, Inc. c/o Cannon Cochran Management Services, Inc.  
Date of Accident: April 17, 2018  
WCC File No.: 1809996  
Our File No.: 2024.22054  
Claim No.: 18J28K142496  
Appeal No.: 2022-000864

Dear Ms. Kitchings:

Enclosed please find the original of Appellants' Motion for Extension of Time, and the Proof of Service in the above-referenced matter. We are serving counsel of record via email only. Pursuant to the Supreme Court's Order, 2021-08-25-03, Reduced Number of Copies Required in Appellate Matters, and Rule 267(f), SCACR, only one copy of Appellants' Return is being submitted. Our check in the amount of \$50.00 for the filing fee will be sent via U.S. Mail with a copy of this letter.

Please let us know if you have any questions. Thanking you in advance for your assistance.

Sincerely,  
McAngus Goudelock & Courie, LLC

Helen F. Hiser

Enclosures

cc: Donald E. Kamb, Jr., Esq.  
Joe Mooneyham, Esq.

**McANGUS GOUDELOCK & COURIE LLC**

735 JOHNNIE DODDS BLVD, STE 200  
POST OFFICE BOX 650007  
MT. PLEASANT, SC 29465

843.576.2900 PHONE  
843.534.0605 FAX  
WWW.MGCLAW.COM