

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

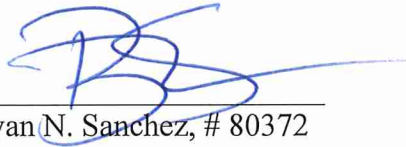
Pursuant to Rule 240, SCACR, Appellant Kyle R. Bagley, hereby move for an extension of time to file and serve Appellant's Reply Brief. This filing is currently docketed for submission on or before October 26, 2022. Appellant respectfully request an extension of thirty (10) days to file and serve his Reply Brief which would then be due on or before November 5, 2022.

The grounds for this motion are that Attorney Nicholas Stark, who had been working on this matter had a medical emergency and is currently in the hospital and co-counsel cannot finish this in time to submit this without Attorney Stark's current work done on such, thereby necessitating 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 did not state any opposition to this extension. This is the second

request for an extension by Appellant by given the emergent circumstances it is unfortunately necessitated.

Therefore, Appellant requests an extension of time until on or before November 5, 2022, to file and serve his Reply Brief.

Respectfully submitted,



Bryan N. Sanchez, # 80372
Nicholas J.A. Stark, # 103414
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Rock Hill, SC 29731
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nick.stark@stacylewislaw.com
Attorneys For Appellant

Rock Hill, South Carolina
October 26, 2022.

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
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APPEAL FROM THE
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION
WCC File No. 1908703
Appellate Case No. 2022-000067

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 October 26, 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

Bryan N. Sanchez, #80372
Nicholas J.A. Stark, # 103414
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Attorneys for Appellant

Rock Hill, South Carolina
October 26, 2022.

LEWIS LAW FIRM

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E. Stacy Lewis
Grady E. McMehan
Bryan N. Sanchez*
Nicholas J.A. Stark*
*Licensed in NC & SC
Attorneys-at-Law

October 26, 2022

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Oct 26 2022

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

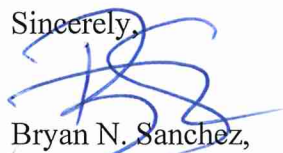
RE: Kyle R. Bagle v. Sun Fiber, LLC, and Great American Alliance Insurance Company
Appellate Case No.: 2022-000067
Date of Accident: June 14, 2019

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,


Bryan N. Sanchez,
Attorney

BNS/jl

Enclosures (as stated)

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