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**Dec 05 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.: 2022-000282

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Michael K. Crowley, Employee, .....Appellant,

vs.

Darlington County, Employer, and  
South Carolina Association of Counties SIF, Carrier..... Respondents.

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**RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER**

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Respondents, by and through their undersigned Counsel, hereby moves before this Honorable Court for a thirty (30) day extension in which to file Respondents' initial brief and designation of matter to be included in the record on appeal. Respondents' initial brief is currently due on December 10, 2022. If the extension is granted, Respondents' Brief will be due on January 9, 2023. As grounds for this Motion, Respondents would show that additional time is needed as Counsel currently has a large number of open cases before the Workers' Compensation Commission in pending litigation. Respondents would further note that this is their first request for an extension in this case, and Appellant has posed no objection to Respondents' request for a thirty (30) day extension.

**[Signature Block on Following Page]**



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jgcoggiola@wjcblaw.com  
Attorney for Respondents

December 5, 2022  
Columbia, South Carolina

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PROOF OF SERVICE

I certify that I have served **Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter (1<sup>st</sup> request)**, by electronic mail, on the Honorable Jenny Abbott Kitchings, Clerk of Court of the South Carolina Court of Appeals at:  
ctappfilings@sccourts.org.

In addition, I certify that I have served the same on the counsel of record for all Appellant in the above-captioned claim at the following addresses, by electronic mail:

Preston F. McDaniel, Esquire (preston@pfmcdlaw.com)  
Gerald Malloy, Esquire (gmalloy@bellsouth.net)  
*Attorneys for Appellant Michael K. Crowley*



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**Sent Via Email (ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
1220 Senate Street, Columbia, SC 29201  
Columbia, SC 29211

Re: Michael K. Crowley v. Darlington County  
**Appellate Case No. 2022-000282**

Dear the Honorable Ms. Kitchings:

Pursuant to Rule 240, SCACR, enclosed please find Respondents' motion for extension of time (1<sup>st</sup>) to file initial brief and designation of matter to be included in the record on appeal, along with proof of service for the same. Please note that Respondents will hand deliver the necessary fifty and 00/100 dollars (\$50.00) filing fee in person today.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your attention to this matter.

With kindest regards,

**WILLSON JONES CARTER & BAXLEY, P.A.**

John Gabriel Coggiola

JGC/jgc

Enclosures: Respondents' Motion for Extension (1<sup>st</sup>)  
Proof of Service

cc:

Mr. Preston F. McDaniel, Esquire (via email)  
Mr. Gerald Malloy, Esquire (via email)