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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Appellate Case No.: 2012-213267

RECEIVED

JUN 07 2013

SC Court of Appeals

Joseph C. Coonce, Employee, Appellant,

v.

Fleet Source, Inc., Employer, and The South Carolina Uninsured Employers' Fund, of whom The South Carolina Uninsured Employers' Fund is the Respondent.

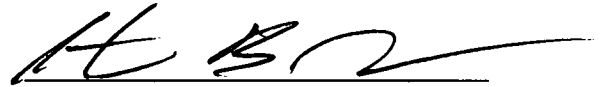
**MOTION FOR LEAVE TO FILE APPELLANT'S INITIAL REPLY BRIEF
OUT OF TIME**

Appellant, by and through his undersigned attorney, hereby petitions this Honorable Court to grant leave to file and serve the Appellant's Initial Reply Brief out of time. As grounds for granting this Motion, Appellant would show:

1. The Court had previously granted a single extension in which to file the Reply brief, thus making the brief due on June 3, 2013. This date also coincided with a considerably lengthier and more complicated brief in another matter pending before the Court.
2. Due to the press of work and moving his office, counsel for Appellant inadvertently failed to meet the aforesaid deadline.

THEREFORE, Appellant requests the Court issue an Order granting the Motion for Leave to File Appellant's Initial Reply Brief Out of Time and extend the time for filing to June 7, 2013.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S B S', is written over a horizontal line.

Stephen B. Samuels
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Attorney for Appellant

Columbia, South Carolina

June 7, 2013

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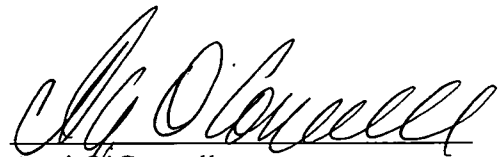
v.

Fleet Source, Inc., Employer, and The South Carolina Uninsured Employers' Fund, Respondents.

PROOF OF SERVICE

I certify that I am the paralegal to Stephen B. Samuels and I have served the **Motion for Leave to File Appellant's Initial Reply Brief Out of Time** upon the Respondents by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed as follows:

Robert M. Cook, II, Esquire
Attorney for Uninsured Employers Fund
Robert Cook Law Firm, LLC
Post Office Box 3575
Batesburg-Leesville, South Carolina 29070


Angi O'Connell

Columbia, South Carolina

June 7, 2013