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Jan 31 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM
THE WORKERS' COMPENSATION COMMISSION

SCWCC Case No. 1809996
Court of Appeals Case No. 2022-000864

William D. Downes, Employee, Respondent,

vs.

Bon Secours Mercy Health, Inc., Employer, and
Safety Nat'l Cas. Corp., Carrier, Appellants.

MOTION FOR EXTENSION OF TIME

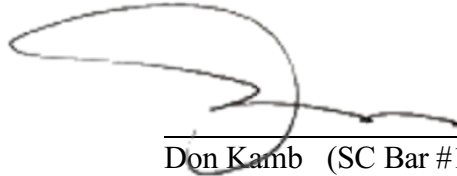
Respondent Danny Downes moves pursuant to 240 and 263(b), SCACR, for an extension of time in which to file his Initial Brief and Designation of Matter for the Record on Appeal in this matter currently pending before the Court. This motion is made on the following grounds:

1. Respondent's Initial Brief and Designation of Matter for the Record on Appeal is due February 3, 2023, following one previous motion for extension filed by the undersigned.
2. Due to calendar constraints, Respondent's attorney is in need of additional time in which to finalize and file the brief and designation in this matter.

3. Therefore, Respondent believes that a 30-day extension of time is warranted and certifies that the requested extension is not interposed to delay the case.
4. By my calculation, Respondent's Initial Brief and Designation of Matter for the Record on Appeal would be due on March 6, 2023, if granted.

WHEREFORE, respondent prays for an Order extending the time for filing her Initial Brief of Respondent and Designation of Matter for the Record on Appeal in this matter for 30 days.

Respectfully submitted,



Don Kamb (SC Bar #16633)
Williams & Kamb, LLC
PO Box 10693
Greenville, SC 29603
(864) 235-6254
dkamb@williamskamb.com
Attorney for Respondent

Dated 1/31/2023
Greenville, South Carolina

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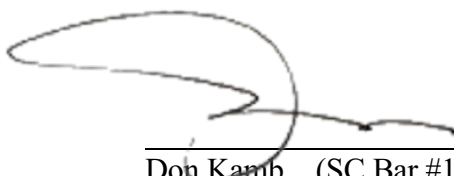
vs.

Bon Secours Mercy Health, Inc., Employer, and
Safety Nat'l Cas. Corp., Carrier, Appellants.

PROOF OF SERVICE

I certify that I have served the **MOTION FOR EXTENSION OF TIME** on the below-named attorney of record for appellants by forwarding copies electronically to the addresses shown on 1/31/23, as follows:

Helen F. Hiser, Esq.
McAngus Goudelock & Courie, LLC
by e-mail to helen.hiser@mgclaw.com



Don Kamb (SC Bar #16633)
Williams & Kamb, LLC
dkamb@williamskamb.com
Attorney for Respondent

WILLIAMS & KAMB, LLC
ATTORNEYS AT LAW

KATHRYN WILLIAMS, *of counsel*
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January 31, 2023

The Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211
via e-filing at ctappfilings@sccourts.org

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Jan 31 2023
SC Court of Appeals

Re: **William D. Downes v. Bon Secours Mercy Health, Inc., et al.**
Appellate Case No.: 2022-000864

Dear Ms. Kitchings:

Enclosed herein please find the following items for filing in the above-referenced matter:


1. Motion for Extension of Time;
2. Proof of Service.

The filing fee will be mailed to your office.

Kindest regards,

Yours truly,

Williams & Kamb, LLC



Don Kamb

dek
Enclosures

cc: Helen F. Hiser, Esq., via e-mail only
Ashley R. Forbes, Esq., via e-mail only
Joe Mooneyham, Esq., via e-mail only