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Jul 16 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE WORKERS' COMPENSATION COMMISSION

T. Scott Beck, Commissioner
R. Michael Campbell, II, Commissioner
Aisha G. Taylor, Commissioner

W.C.C. FILE NO.: 2106012

Appellate Case No. 2024-000607

Nathaniel Coakley, Claimant,Appellant,

v.

Pilgrims' Pride Corp.,
Employer, and American
Zurich Ins. Co., Carrier, Respondents.

**MOTION REQUESTING EXTENSION TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER**

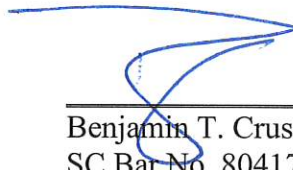
PLEASE TAKE NOTICE that pursuant to Rules 208, 209, 240 and 263(b) of the South Carolina Appellate Court Rules, the Appellant Nathaniel Coakley, by and through his undersigned attorney, moves for an Order granting a thirty (30) day extension of time within which to file the Initial Brief of Appellant and Designation of Matter. Appellant received all transcripts on June 17, 2024.

This motion is made on the grounds that the undersigned attorney has experienced unanticipated issues, coupled with other unanticipated hearings and court appearances, and other case deadlines that have arisen over the past several weeks that have precluded counsel's ability to devote the requisite time to the research and drafting of the Initial Brief of Appellant. Counsel

needs the requested extension to properly present focused and cogent arguments. Appellant has consulted with Respondent about this request, and counsel for Respondent has stated he has no objection.

Accordingly, Appellant respectfully request that the Court grant their request for a thirty (30) day extension to serve and file their initial brief and designation of matter.

Respectfully Submitted,



Benjamin T. Cruse, Esquire
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ATTORNEY FOR APPELLANT

July 16, 2021
Charleston, South Carolina

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v.


Pilgrim's Pride Corp.,
Employer, and American
Zurich Ins. Co., Carrier, Respondents.

CERTIFICATE OF SERVICE

I certify that I have served **Appellant's Motion for Extension to Serve and File Initial Brief and Designation of Matter** on Respondents electronically by emailing a copy of the same to counsel on record using the lawyer's primary e-mail address listed in the Attorney Information System (AIS). Additionally, the undersigned certifies that on July 16, 2024, he served counsel for Respondents by depositing a copy of the same in the United States Mail, postage prepaid and addressed to his attorney of record as described below:

VIA USPS FIRST CLASS MAIL

Timothy B. Killen, Esq.
Holder Padgett Littlejohn + Pricket, LLC
945 Houston Northcutt Blvd.
Mt. Pleasant, SC 29464
Email: tkillen@hplplaw.com



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July 16, 2024
Charleston, SC



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Call For Additional Office Locations

July 16, 2024

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

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SC Court of Appeals

**RE: *Nathaniel Coakley, Appellant v. Pilgrim's Pride Corp. and American Zurich Ins. Co.,
Respondents.
Appellate Case No. 2024-000607***

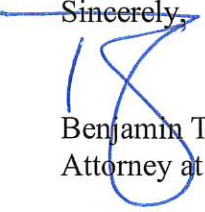
Dear Honorable Kitchings:

Enclosed for filing is the original and one (1) copy of Appellants' Motion Requesting Extension to File Initial Brief and Designation of Matter in the above-referenced matter. I have enclosed the filing fee of \$50.00 for the same. I have also enclosed proof of service upon Counsel for Respondents. Please return the filed copies to me in the enclosed self-addressed stamped envelope.

This request is based on an increased workload that we are experiencing at this time. I have consulted with Respondents, and they have stated there is no objection to this request.

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

Sincerely,



Benjamin T. Cruse
Attorney at Law

BTC/jcm

cc: Timothy B. Killen, Esq. (w/encls)
SC Office of Court Administration