

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION
SINGLE COMMISSIONER & APPELLATE PANEL

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AUG 28 2013

SC Court of Appeals

WCC File No. 0901428
WCC File No. 0905998

Katherine Haines.....Claimant/Respondent,
vs.
Dollar Tree Stores, Inc..... Employer,
and
ARCH Insurance Company.....Carrier,
Defendants/Appellants

APPELLANTS MOTION FOR EXTENSION OF TIME
TO FILE ITS INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON
APPEAL

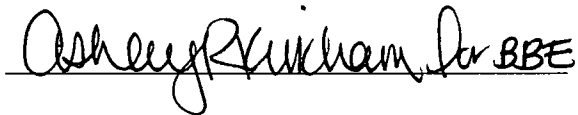
Pursuant to Rule 224 of the South Carolina Rules of Appellate Practice, Appellants Dollar Tree Stores, Inc. and ARCH Insurance Company, hereby move this Court for an Order granting an extension of time during which to file its Initial Brief and Designation of Matter to be included in the Record on Appeal. For the reasons set forth below, Appellants request an additional period of thirty days from August 29, 2013, during which to file these documents.

This appeal arises from a claim for workers' compensation benefits wherein Respondent was deemed permanently and totally disabled. The additional time requested is warranted given the complexity of the legal issues presented. The thirty-day extension will not prejudice Respondent or affect her legal rights as she is currently receiving all benefits currently due. Appellants request that the due date for the Initial Brief and Designation of Matter be held in

abeyance, until such time as this motion is reviewed and decided upon.

As stated above, Appellants intend to work diligently and to file their Initial Brief and Designation of Matter as soon as practicable. However, for the reasons stated above, Appellants respectfully request that the Court grant a thirty-day extension of time during which they may file their Initial Brief and Designation of Matter.

Respectfully submitted,

A handwritten signature in black ink, reading "Ashley R. Easterling, Esq.", written over a horizontal line. The signature is cursive and includes the initials "BBE" at the end.

Brad B. Easterling, Esq.
South Carolina Bar No. 70328
Turner Padgett Graham & Laney, P.A.
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(864) 552-4619
Attorneys for Appellants

August 28, 2013

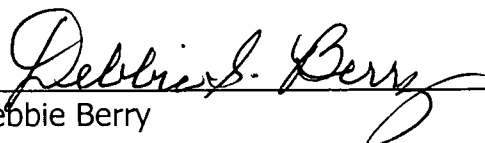
CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at TURNER, PADGET, GRAHAM & LANEY, P.A., and that the attached *Motion for Extension of Time to file Appellants' Initial Brief and Designation of Matter to be Included in the Record of Appeal and Certificate of Service* were served upon, Joseph T. McElveen, Jr., Esquire., attorney for Claimant, this 28th day of August 2013, in accordance with Regulations 67-210, 67-211, 67-213, 67-214, and 67-215 and such other law as may be applicable by U.S. mail, addressed to:

The Honorable Virginia L. Crocker, Judicial Director
SC Workers' Compensation Commission
P. O. Box 1715
Columbia, SC 29202-1715

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals, Clerk
1015 Sumter Street
Columbia, SC 29201

Joseph T. McElveen, Jr., Esquire
Bryan Law Firm
P.O. Box 2038
Sumter, SC 29151-2038


Debbie Berry