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Apr 16 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from The South Carolina
Workers' Compensation Commission

Cynthia C. Dooley, Commissioner
Gene McCaskill, Commissioner
R. Michael Campbell, Commissioner

Appellate Case No. 2025-000026
WCC File No. 1921668

Evaristo Verdugo Morales, Claimant,

Respondent-Appellant,

v.

Insulation By Cohen's & Sprayfoam by Cohen's, LLC, Employer,
and Builders Premier Insurance Company, Carrier,

Appellants-Respondents.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF OF APPELLANT**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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(843) 720-5488
Attorneys for Appellants-Respondents

COME NOW Appellants-Respondents, Insulation By Cohen's & Sprayfoam by Cohen's, LLC, and Builders Premier Insurance Company, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their appellants' initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with this Court's Order consolidating appeals filed March 18, 2025, the deadline for Appellants-Respondents' initial appellants' brief and designation of matter is April 17, 2025. On account of work-related and other time commitments, Appellants-Respondents respectfully request this deadline be extended by 30 days. Respectfully, Appellants-Respondents believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent-Appellant.

WHEREFORE, Appellants-Respondents move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their appellants' initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their appellants' initial brief and designation of matter would be May 19, 2025, according to the undersigned's calculations. Further, Appellants-Respondents respectfully request the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellant, Appellate No. 2025-000026]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*

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Builders Premier Insurance Company*

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PROOF OF SERVICE

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Attorneys for Appellants-Respondents

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellants-Respondents, hereby certify that their **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on all other parties to this appeal on April 16, 2025, via email (see attached) to their following counsel of record:

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By: s/Stephen L. Brown
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Attorney for Appellants

Charleston, South Carolina

April 16, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, April 16, 2025 10:51 AM
To: dgibson@dgibsonlaw.com; preston@pfmtclaw.com; law2@dgibsonlaw.com; kim@pfmtclaw.com
Cc: Brown, Stephen L.; Gruber, Robert; Hines, Russell; Olive, IV, Graydon; Justman, Aimee
Subject: Morales v. Insulation by Cohen, LLC; Appellate Case No. 2025-000026 (CR 20200118)
Attachments: 1st Motion for Extension - Initial Brief.pdf

Enclosed please find Appellants-Respondents' Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,
Russell G. Hines, Stephen A. Griffith, Jr.

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