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**Jun 13 2025**

**SC Court of Appeals**

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

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Appeal from The South Carolina  
Workers' Compensation Commission

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

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

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Evaristo Verdugo Morales, Claimant,

Respondent-Appellant,

v.

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

Appellants-Respondents.

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**MOTION FOR EXTENSION OF TIME TO FILE/SERVE  
INITIAL RESPONDENTS BRIEF OF APPELLANTS-RESPONDENTS**

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

Presently, in accordance with Rule 208(a)(2), the deadline for Appellants-Respondents' initial respondents' brief and designation of matter is June 16, 2025. On account of work-related and other time commitments, Appellants-Respondents respectfully request this deadline be extended by thirty 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 thirty days' time to file/serve their initial respondents' 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 initial respondents' brief and designation of matter would be July 16, 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 Respondents, Appellate No. 2025-000026]*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*

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Charleston, South Carolina

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP

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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 RESPONDENTS BRIEF OF APPELLANTS-RESPONDENTS** was served on all other parties to this appeal on June 13, 2025, via email (see attached) to their following counsel of record:

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By: s/Stephen L. Brown  
Stephen L. Brown (SC Bar No. 66468)  
*Attorney for Appellants-Respondents*

Charleston, South Carolina

June 13, 2025

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Friday, June 13, 2025 12:42 PM  
**To:** dgibson@dgibsonlaw.com; preston@pfmcdlaw.com; law2@dgibsonlaw.com;  
kim@pfmcdlaw.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:** Motion for Extension - Initial Respondents Brief.pdf

Enclosed please find Appellants-Respondents' Motion for Extension of Time to File/Serve their Initial Respondents 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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