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Jul 17 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, LLC, Employer,
and Builders Premier Insurance Company, Carrier,

Appellants-Respondents.

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

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 a second 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, by orders of this Court filed July 1, 2025 and July 10, 2025, the deadline for Appellants-Respondents' initial respondents' brief and designation of matter is July 18, 2025. On account of work-related and other time commitments, including the main author of this brief having recently taken time off to undergo significant oral surgery and still needing time for proper recovery, 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 a second 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 August 18, 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.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Stephen L. Brown

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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 **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL RESPONDENTS BRIEF OF APPELLANTS-RESPONDENTS** was served on all other parties to this appeal on July 17, 2025, via email (see attached) to their following counsel of record:

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CLEMENT RIVERS, LLP

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Stephen L. Brown (SC Bar No. 66468)
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Charleston, South Carolina

July 17, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, July 17, 2025 10:33 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: 2nd Motion for Extension - Initial Respondents Brief.pdf

Enclosed please find Appellants-Respondents' Second 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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