

**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)
Robert P. Gruber (SC Bar No. 15581)
Russell G. Hines (SC Bar No. 72100)
Graydon V. Olive, IV (SC Bar No.: 105319)
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for Appellants-Respondents

RECEIVED

Jul 17 2025

SC Court of Appeals

RECEIVED

JUL 28 2025

SC Court of Appeals

105370

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* _____

Stephen L. Brown (SC Bar No. 66468)

Robert P. Gruber (SC Bar No. 15581)

Russell G. Hines (SC Bar No. 72100)

Graydon V. Olive, IV (SC Bar No.: 105319)

25 Calhoun Street, Suite 400 (29401)

P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

Attorneys for Appellants-Respondents

Charleston, South Carolina

July 17, 2025

RECEIVED

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.

PROOF OF SERVICE

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

Robert P. Gruber (SC Bar No. 15581)

Russell G. Hines (SC Bar No. 72100)

Graydon V. Olive, IV (SC Bar No.: 105319)

25 Calhoun Street, Suite 400 (29401)

P.O. Box 993

Charleston, South Carolina 29402

(843) 720-5488

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:

Don C. Gibson, Esquire
Gibson Law Firm, LLC
Post Office Box 60669
North Charleston, SC 29419-0669
dgibson@dgibsonlaw.com
law2@dgibsonlaw.com
Attorneys for Evaristo Verdugo Morales

Preston F. McDaniel, Esquire
McDaniel Law Firm
1315 Elmwood Avenue
Columbia, SC 29201
preston@pfmcdlaw.com
kim@pfmcdlaw.com
Attorneys for Evaristo Verdugo Morales

CLEMENT RIVERS, LLP

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

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@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: 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.
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com



CLEMENT RIVERS, LLP

ATTORNEYS AT LAW

Pollyana Bell
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: pbell@ycrlaw.com

July 18, 2025

RECEIVED

JUL 28 2025

SC Court of Appeals

VIA US MAIL

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

Re: Evaristo Verdugo Morales v. Insulation By Cohen's & Sprayfoam by Cohen's,
LLC
Appellate Case No.: 2025-000026
YCR File: 10857-20200118

Dear Ms. Kitchings:

Enclosed please find our firm's check representing the filing fee for Appellants-Respondents' Second Motion for Extension of Time to File/Serve their Initial Respondents Brief, which was electronically filed on July 17, 2025, in the above-referenced matter.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Pollyana Bell
Secretary

/pbb
Enclosure(s)



CLEMENT RIVERS, LLP

P.O. Box 993
Charleston, SC 29402

SLB
20200118

CHARLESTON SC 294

quadrant

FIRST-CLASS MAIL
IMI

19 JUL 2025 AM 1 L

07/18/2025

US POSTAGE

\$001.03⁰



ZIP 29401
041M12254069

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

RECEIVED

JUL 28 2025

SC Court of Appeals

20211-162929

