

RECEIVED

Aug 27 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.

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

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

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 ten (10) days' additional time to file/serve their appellants' initial reply brief.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants-Respondents' initial reply brief is August 28, 2025. On account of work-related and other time commitments, Appellants-Respondents respectfully request this deadline be extended by 10 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 reply brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be September 8, 2025, according to the undersigned's calculations. Further, Appellants-Respondents respectfully request the Court hold the present deadline in abeyance until it acts upon this motion.

*[Signature page for Motion for Extension of Time to File/Serve Appellants-
Respondents' Initial Reply Brief, Appellate No. 2025-000026]*

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

Charleston, South Carolina

August 27, 2025

RECEIVED

Aug 27 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.

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 **MOTION FOR EXTENSION OF TIME TO FILE/SERVE APPELLANTS-RESPONDENTS' INITIAL REPLY BRIEF** was served on all other parties to this appeal on August 27, 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

Charleston, South Carolina

August 27, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, August 27, 2025 9:58 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 Reply Brief.pdf

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

MatterId: