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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 RETURN TO MOTION TO
SUPPLEMENT THE RECORD AND FILE AMENDED INITIAL 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 return to Respondents-Appellants' Motion to Supplement the Record and to File Amended Initial Brief.

Presently, in accordance with Rule 240(e), the deadline for Appellants-Respondents' return to the motion is today, Monday, September 8, 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 10 days' time to file/serve their return to Respondents-Appellants' Motion to Supplement the Record and to File Amended Initial Brief. With the extension requested herein, the new deadline for filing/serving their initial reply brief would be September 18, 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 Motion for Extension of Time to File/Serve Return to Motion to Supplement the Record and File Amended Initial 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)

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Attorneys for Insulation By Cohen's &

Sprayfoam by Cohen's, LLC and

Builders Premier Insurance Company

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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 RETURN TO MOTION TO SUPPLEMENT THE RECORD AND FILE AMENDED INITIAL BRIEF** was served on all other parties to this appeal on September 8, 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

September 8, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Monday, September 8, 2025 2:04 PM
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: Motion for Extension - Return to Motion to Supplement Record.pdf

Enclosed please find Appellants-Respondents' Motion for Extension of Time to File/Serve their Return to Motion to Supplement the Record and File Amended 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.
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: