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NOV 21 2013

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

S.C. Supreme Court

APPEAL FROM SOUTH CAROLINA WORKERS COMPENSATION COMMISSION  
South Carolina Workers' Compensation Commission

Full Commission Review  
Derrick Williams, Commissioner

APPELLATE CASE NO.: 2012-206589

Patricia D. Johnson.....Petitioner,

v.

BMW Manufacturing Corporation, LLC.....Employer,

And

Hartford Insurance Company of the Midwest  
and Specialty Risk Services, Inc.....Carrier, Respondents.

**MOTION TO EXTEND TIME FILE REPLY BRIEF**

Albert V. Smith  
Attorney for Petitioner  
P.O. Box 5866  
Spartanburg, SC 29304  
Phone: (864) 585-8174  
Fax: (864) 573-6348

Other Counsel of Record:  
Vernon F. Dunbar  
Attorney for Respondents  
P. O. Box 1509  
Greenville, SC 29602  
Phone: (864) 552-4601  
Fax: (864) 552-4620

**MOTION**

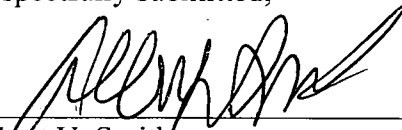
**TO: Vernon F. Dunbar, Esquire, Attorney for Respondents:**

Please take notice that the Attorney for the Petitioner is moving before the South Carolina Supreme Court for an Order extending the time for which the filing of the Petitioner's Reply Brief is due pursuant to SCACR 240. The Petitioner is unaware of any Order that is outstanding that would not permit the granting to the requested extension.

The Petitioner's Attorney has been informed that the Reply Brief was to have been filed by November 4, 2013. The Attorney for the Petitioner had entered on his book that the ten (10) days to file the reply was November 14, 2013 due to the time he received it. The Reply was shipped for filing November 12, 2013. Three copies were served on the Attorney for the Respondents.

The Attorney for the Petitioner duly believes this is excusable neglect and the motion should be granted.

Respectfully submitted,



---

Albert V. Smith  
Post Office Box 5866  
Spartanburg, SC 29304  
Phone: (864) 585-8174  
Fax: (864) 573-6843

Date: November 13, 2010

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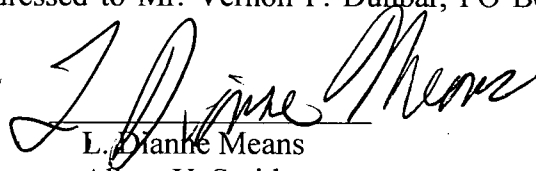
And

Hartford Insurance Company of the Midwest  
and Specialty Risk Services, Inc.....Carrier, Respondents.

PROOF OF SERVICE

I certify that I have served the Petitioner's Motion to Extend Time to File Reply Brief, and a copy of this Proof of Service on Vernon F. Dunbar, Esquire, attorney for Respondents, by depositing a copy of each of the documents in the United States Mail, postage prepaid, on November 13, 2013, addressed to Mr. Vernon F. Dunbar, PO Box 1509, Greenville, SC 29602.

Date: November 13, 2013



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Albert V. Smith  
Attorney for Appellant  
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Albert V. Smith, P.A.

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Albert V. Smith  
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Daryl L. Bush  
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November 13, 2013

Mr. Daniel Shearouse  
Clerk of the Supreme Court  
PO Box 11330  
Columbia, SC 29211

RECEIVED

NOV 21 2013

S.C. Supreme Court

Re: Patricia D. Johnson vs BMW Manufacturing Corporation, LLC  
Appellate Case No. 2012-206586

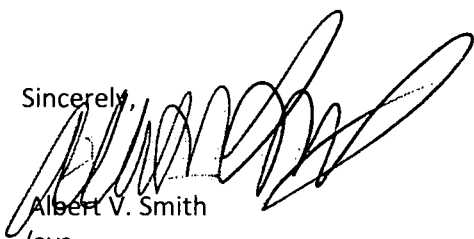
Dear Mr. Shearouse:

This is to advise you that I represent the Petitioner in the above matter. The Supreme Court granted Certiorari in the matter on July 25, 2013. The Petitioner's Reply Brief was due in your office on November 4, 2013 according to Court personnel. Your office received the Reply Brief on November 13, 2013, and therefore, I am enclosing a motion to extend the time that Reply Brief may be filed. You will find the original and six copies of the motion and. You will, also, find a certificate of service showing the motion has been served on Mr. Vernon F. Dunbar. My twenty-five (\$25) dollar filing fee check is also enclosed.

By copy of this letter to Mr. Vernon F. Dunbar, opposing counsel, I am informing him of our motion for an extension to file the Reply Brief and appendix. I am asking him to contact your office should he have any objections.

Thanks.

Sincerely,

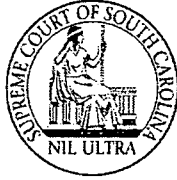


Albert V. Smith

/avs

Encl.

cc: Vernon F. Dunbar



# The Supreme Court of South Carolina

Albert Smith

11/21/2013

## RECEIPT #70463

**Case No:** 2012-206586  
**Case Short Title:** Patricia Johnson v. BMW  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 17827  
**Check/Money Order Date:** 11/21/2013  
**Comments:**

*Linked*