

Albert V. Smith, P.A.

Attorneys at Law

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November 13, 2013

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

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

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NOV 22 2013

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the 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

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NOV 22 2013

S.C. SUPREME COURT

MOTION

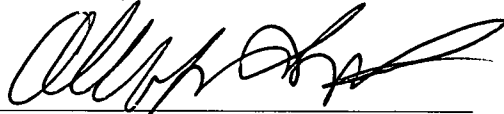
TO: Vernon F. Dunbar, Esquire, Attorney for Respondents:

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
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Date:  2010

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In the Supreme Court

APPEAL FROM SOUTH CAROLINA WORKERS COMPENSATION COMMISSION
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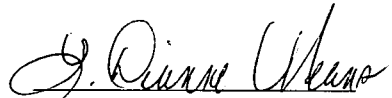
And

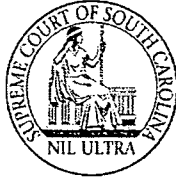
Hartford Insurance Company of the Midwest
and Specialty Risk Services, Inc.....Carrier, Respondents.

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 October 1, 2013, addressed to Mr. Vernon F. Dunbar, PO Box 1509, Greenville, SC 29602.

Date: November 13, 2013


L. Dianne Means
Albert V. Smith
Attorney for Appellant
410 Magnolia Street
P.O. Box 5866
Spartanburg, S. C. 29304
Phone: (864) 585-8174



The Supreme Court of South Carolina

Albert Smith

11/22/2013

RECEIPT #70468

Case No: 2012-206586
Case Short Title: Patricia Johnson v. BMW
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 17825
Check/Money Order Date: 11/13/2013
Comments:

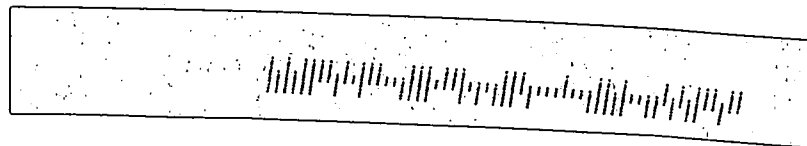
Returned check # 17825

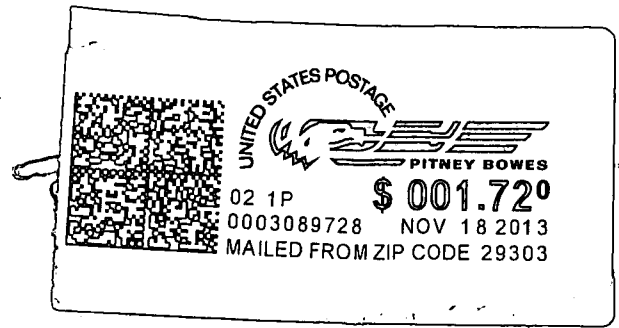


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TO:

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