



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

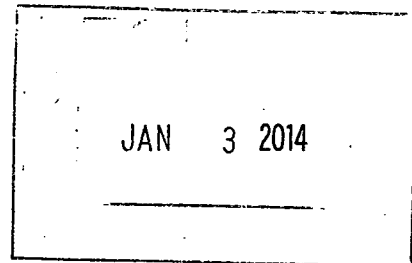
V. CLAIRE ALLEN
DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1015 SUMTER STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

December 31, 2013

Mr. Vernon F. Dunbar
PO Box 1509
Greenville SC 29602

Re: SC Second Injury Fund v. Speciality Risk Services
Appellate Case No. 2013-001892



Dear Counsel:

Upon reviewing your motion for extension, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jenny A. Kitchings".

CLERK

RECEIVED

JAN 10 2014

SC Court of Appeals

cc: Latonya Dilligard Edwards, Esquire

TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

CHARLESTON
COLUMBIA
FLORENCE
GREENVILLE
MYRTLE BEACH

December 20, 2013

Vernon F. Dunbar
Attorney / Certified Mediator

VDunbar@TurnerPadget.com
Direct Dial: (864) 552-4601

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

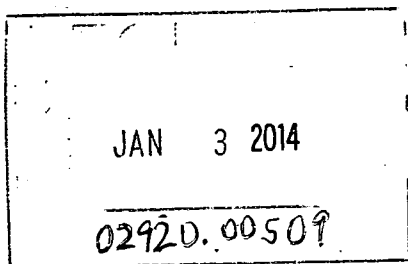
RE: South Carolina Second Injury Fund vs. Specialty Risk Services
[In Re: Tunde Quarles Szabo v. BMW Manufacturing Corporation]
Appellate Case No.: 2013-001892
TPGL File No.: 02920.00509

Dear Ms. Kitchings:

Please find enclosed a Notice of Motion and Motion for Extension of Time in which to file the Initial Brief of Respondent in the above-referenced matter. To this end, I am enclosing a \$25 filing fee in order to process my request.

By copy of this letter to Latonya Edwards, attorney for Appellant Second Injury Fund, I am apprising her of the filing of this Motion and my request for an additional 30-day extension.

With kind and warm regards, I remain



Very truly yours,

TURNER PADGET GRAHAM & LANEY P.A.

Vernon F. Dunbar

Vernon F. Dunbar
RECEIVED

JAN 10 2014

VFD/mjs

Enclosures

cc: Latonya Edwards, Esquire (w/enclosures)

RECEIVED
SC Court of Appeals

DEC 27 2013

SC Court of Appeals

TPGL 5506942v1

BUSINESS • LITIGATION • SOLUTIONS

200 East Broad Street • Suite 250 (29601) • PO Box 1509 • Greenville, SC 29602
Phone (864) 552-4600 • Fax (864) 552-4620 • turnerpadget.com

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Letitia H. Verdin

Case No.: 2013-001892

RECEIVED
DEC 27 2013
SC Court of Appeals

South Carolina Second Injury Fund.....Appellant,

vs.

Specialty Risk Services.....Respondent.

**NOTICE OF MOTION AND MOTION FOR EXTENSION
OF TIME IN WHICH TO FILE INITIAL BRIEF OF RESPONDENT**

TO: THE HONORABLE JENNY ABBOTT KITCHINGS, CLERK OF COURT OF THE SOUTH CAROLINA COURT OF APPEALS; and LATONYA EDWARDS, ESQUIRE, ATTORNEY FOR SOUTH CAROLINA SECOND INJURY FUND, APPELLANT

The Initial Brief of Respondent, Specialty Risk Services, is due on December 27, 2013. Counsel for Respondent respectfully requests an additional thirty (30) days in order to properly file the initial Respondent's Brief.

Accordingly, counsel for Respondent hereby requests a thirty (30) day extension in which to file the required Initial Brief. The undersigned calculates that the due date in which to file the Initial Brief, if such is granted by the Court, will be on January 27, 2014. Please be advised that the request for this Motion has been discussed with opposing counsel, Latonya Edwards, who has no objection to the request.

Respectfully submitted,

By: 

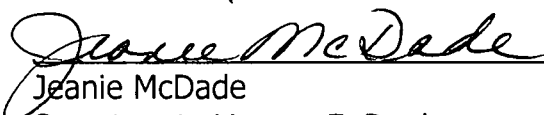
Vernon F. Dunbar, Esquire
Turner Padgett Graham & Laney, P.A.
P.O. Box 1509
Greenville, SC 29602
Telephone: 864-552-4601

Greenville, South Carolina
December 20, 2013

PROOF OF SERVICE

The undersigned certifies that she is an employee at TURNER, PADGET, GRAHAM & LANEY, P.A., and that the attached ***Notice of Motion and Motion for Extension of Time in Which to File Initial Brief of Respondent*** was served upon Latonya D. Edwards, Esquire, attorney for the South Carolina Second Injury Fund , this 20th day of December 2013, pursuant to Section 15-9-930 and Section 15-9-940 of the Code of Laws of South Carolina, 1976, by depositing a copy of same in the United States Mail, postage prepaid, addressed to:

Latonya D. Edwards, Esquire
Dilligard Edwards, LLC
3790 Fernandina Road, Suite 103
Columbia, SC 29210



Jeanie McDade
Secretary to Vernon F. Dunbar

RECEIVED
JAN 10 2014
SC Court of Appeals

TURNER PADGETT

TURNER PADGETT GRAHAM & LANNEY P.A.

BUSINESS • LITIGATION • SOLUTIONS

PO Box 1509 • Greenville, SC 29602

GREENVILLE SC 29602
REGISTERED MAIL
FIRST CLASS PERMIT NO. 410 GREENVILLE SC 29602
POSTAGE WILL BE PAID BY ADDRESSEE

JAN 10 2014

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court-South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

29211 62929

