

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

The Honorable Letitia H. Verdin  
Greenville County  
Trial Court Case No.: 2012-CP-23-05822

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M1085

Appellate Case No.: 2013-001892

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

vs.

Specialty Risk Services.....Respondent

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**RECEIVED**

JAN 27 2014

**SC Court of Appeals**

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

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

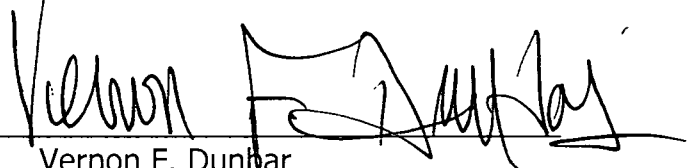
The Initial Brief of Respondents, BMW Manufacturing Corporation, LLC, and its workers' compensation insurance carrier, The Hartford Insurance Company of the Midwest and Specialty Risk Services, Inc., is due on January 27, 2014. Counsel for the Respondents needs additional time or specifically twenty (20) days in order to properly file the Initial Respondents' Brief.

Counsel for Respondents has been involved in week long depositions and two Mediations and has been unable to prepare the Initial Brief and Designation of Matters. The Parties are also engaged in settlement negotiations.

Accordingly, counsel for Respondents hereby respectfully requests a twenty (20) day extension in which to file the required Initial Brief of Respondents. Thus, Respondents' Initial Brief will be filed on or before February 16, 2014.

Respectfully submitted,

By:



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

Greenville, South Carolina  
January 24, 2014

Other Counsel of Record:

Latonya Dilligard Edwards, Esquire  
Dilligard Edwards, LLC  
3790 Fernandina Road, Suite 103  
Columbia, SC 29210  
ATTORNEY FOR APPELLANT

**PROOF OF SERVICE**

The undersigned certifies that she is an attorney/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 Respondents** was served upon Latonya Dilligard Edwards, Esquire, the attorney for the claimant, this 24th day of January 2014, 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

The Honorable Virginia L. Crocker, Judicial Director  
SC Worker's Compensation Commission  
Post Office Box 1715  
Columbia, SC 29202-1715

  
\_\_\_\_\_  
Jeanie McDade  
Secretary to Vernon F. Dunbar

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JAN 27 2014

**SC Court of Appeals**

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

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