

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission  
Andrea C. Roche, Commissioner

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FEB 18 2014

SC Court of Appeals

WCC File No. 1023143

Case Tracking No: 2013-001896

George Ferguson..... Claimant/Appellant.

v.

New Hampshire Insurance Company,  
Carrier for AMERCO/U-HAUL International,  
Sean Unterkoefer d/b/a United Stand Moving,  
Employer, and the S.C. Workers' Compensation  
Uninsured Employers' Fund..... Defendants/Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTER**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT APPEALS:

Respondents AMERCO/U-HAUL International and New Hampshire Insurance Company (collectively "Respondents"), by and through their undersigned counsel, hereby move this Honorable Court for a thirty (30) day extension in which to file the Respondents' Initial Brief and Designation of Matter. The Initial Brief and Designation of Matter was originally due Tuesday, January 21, 2014. This Honorable Court granted a thirty (30) day extension and the Initial Brief and Designation of Matter are currently due Wednesday, February 19, 2014. As grounds for granting this Motion, Respondents would show this appeal involves several issues requiring detailed drafting. Due to the two (2) extensions granted to the Appellant, Appellant's

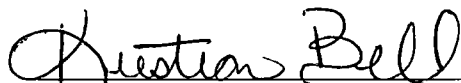
Initial Brief was received while the undersigned attorney was on vacation for the Christmas and New Year's Day holiday. As such, Respondents requested their first extension. Thereafter, two unexpected winter storms hit the Midlands area causing the undersigned to miss several days from work. Moreover, the undersigned attorney is covering an increased caseload due to the recent departure of an attorney within the undersigned's law firm.

Therefore, counsel for Respondents requires additional time to complete the Initial Brief and Designation of Matter. Respondents respectfully request a thirty (30) day extension to file their Initial Brief and Designation of Matter. If the Motion is granted, the due date will be extended to Friday, March 21, 2014.

Counsel for the Appellant and counsel for the South Carolina Workers' Compensation Uninsured Employers' Fund consent to Respondents' request for an extension.

Respectfully Submitted,

COLLINS & LACY, P.C.



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Kristian C. Bell (S.C. Bar No. 76578)  
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ATTORNEYS FOR RESPONDENTS  
AMERCO/U-HAUL INTERNATIONAL AND  
NEW HAMPSHIRE INSURANCE COMPANY

Columbia, South Carolina  
February 18, 2014

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**PROOF OF SERVICE**

I hereby certify that I served the Motion for Extension of Time to File Respondents' Initial Brief and Designation of Matter upon all counsel, by placing a copy in the United States mail, postage prepaid, on February 18, 2014, to the following:

**COUNSEL SERVED:**

Stephen B. Samuels, Esquire  
Samuels Law Firm, LLC  
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Columbia, SC 29201  
*Attorneys for Appellant*

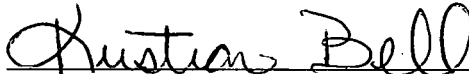
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Respectfully Submitted,

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