

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSTION COMMISSION

WCC FILE NO.: 1206355
Appellate Tracking No.: 2013-002666

Frances Baron, Employee,Appellant,

v.

Sanctuary Hospice, Employer, and
Guarantee Insurance Company c/o
Patriot National Insurance Group, Carrier.....Respondents.

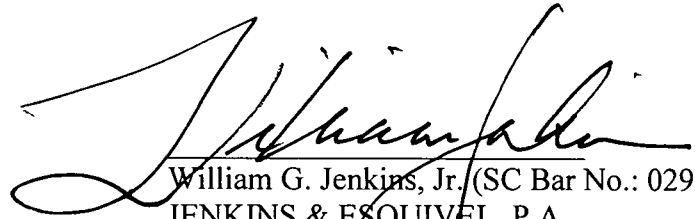
**MOTION FOR EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF
AND MATTER TO BE INCLUDED IN RECORD ON APPEAL**

Appellant, by and through her undersigned attorney, William G. Jenkins Jr., Esquire, hereby moves pursuant to Rule 240(a) of the South Carolina Appellate Court Rules, for a 30 day extension of time for filing her initial Reply Brief and Designation of Matter to be Included in the Record On Appeal. Appellant represents to this Court that Respondent's Initial Brief was received by Appellant on Monday, February 10, 2014 making the deadline for filing of the Initial Reply Brief, Thursday, February 20, 2014. Appellant respectfully requests that this time be extended until March 20, 2014.

This Motion is made upon grounds that Counsel for the Appellant needs this additional time to properly research, and prepare his Initial Reply Brief. Counsel for Appellant would further represent to the Court that all other initial briefs have been filed without benefit of an

extension of time and that the granting of this extension would not unduly delay consideration of this appeal.

January 17, 2014



William G. Jenkins, Jr. (SC Bar No.: 02982)

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Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE FULL COMMISSION OF THE SOUTH CAROLINA WORKERS'
COMPENSTION COMMISSION

WCC FILE NO.: 1206355
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Frances Baron, Employee,Appellant,

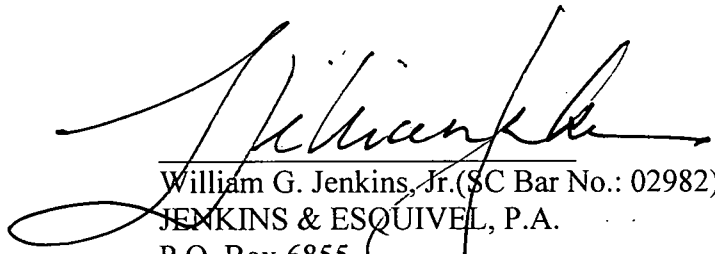
v.

Sanctuary Hospice, Employer, and
Guarantee Insurance Company c/o
Patriot National Insurance Group, Carrier.....Respondents.

MEMORANDUM OF LAW

This Motion for Extension of Time is filed pursuant to Rule 240(a) of the South Carolina
Appellate Court Rules.

January 17, 2014



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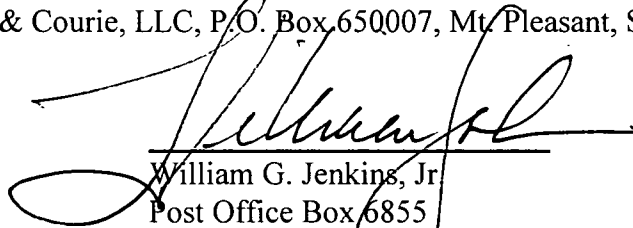
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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Initial Reply Brief and Matter to be Included in Record on Appeal on Sanctuary Hospice and Guarantee Insurance Company by depositing a copy of it in the United States Mail, postage prepaid, on December 13, 2013, addressed to the attorney of record, Helen F. Hiser, Esquire, McAngus, Goudelock & Courie, LLC, P.O. Box 650007, Mt. Pleasant, South Carolina 29465.

February 17, 2014



William G. Jenkins, Jr.
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