

71820

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1023143

George Ferguson, Employee/Claimant, ..... Appellant,

v.

Sean P. Unterkoefer d/b/a United Stand Moving, Employer,

and

AMERCO/U-HAUL International, Employer,

and

New Hampshire Insurance Company, Carrier for AMERCO/U-HAUL International,

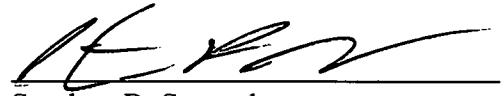
and

S.C. Workers' Compensation Uninsured Employers' Fund ..... Respondents.

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

Appellant, by and through his undersigned attorney hereby moves this Honorable Court for a 20-day extension in which to file the **Initial Brief of Appellant and Designation of Matter to be included in the Record on Appeal**. The Brief and Designation of Matter are currently due on April 3, 2014. If the Motion is granted, the due date will be extended to April 23, 2013. As grounds for granting this Motion, Appellant would show additional time is needed as the undersigned attorney is a sole practitioner; and that this appeal involves several issues requiring detailed briefing.

Respectfully Submitted



Stephen B. Samuels  
Samuels Law Firm, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000  
stephen@samuelslawfirm.net

Natasha M. Hanna  
Law Office of Natasha M. Hanna, P.C.  
4717 Jenn Drive, Suite 102  
Myrtle Beach, SC 29577  
(843) 839-8002  
natasha@nhannalaw.com

Columbia, South Carolina  
April 3, 2014

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

---

WCC File No. 1023143

---

George Ferguson, Employee/Claimant, ..... Appellant,

v.

Sean P. Unterkoefer d/b/a United Stand Moving, Employer,

and

AMERCO/U-HAUL International, Employer,

and

New Hampshire Insurance Company, Carrier for AMERCO/U-HAUL International,

and

S.C. Workers' Compensation Uninsured Employers' Fund ..... Respondents.

---

**PROOF OF SERVICE**

---

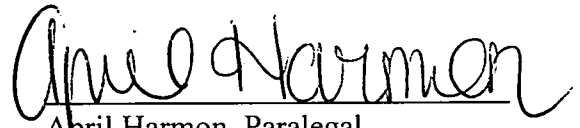
I certify that I am paralegal to Stephen B. Samuels and I have served the **MOTION FOR EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF and DESIGNATION OF MATTER** upon the Respondents by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed as follows:

Kristian M. Cross, Esquire  
Attorney for eMove and New Hampshire Insurance Company  
Collins & Lacy, P.C.  
Post Office Box 12487  
Columbia, South Carolina 29211

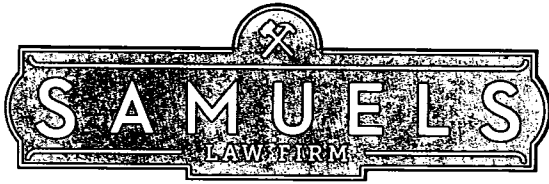
RECEIVED  
APR 07 2014  
S. COURT OF APPEALS

Lisa C. Glover, Esquire  
Uninsured Employers' Fund Division  
State Accident Fund  
Post Office Box 210039  
Columbia, South Carolina 29221-0039

Sean Unterkoefler  
United Stand Moving  
25 Wing Street  
Lisbon Falls, Maine 04252

  
April Harmon, Paralegal

Columbia, South Carolina  
April 3, 2014



STEPHEN B. SAMUELS  
ATTORNEY AT LAW

April 3, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

RE: George Ferguson, Employee/Claimant, Appellant, v. Sean P. Unterkoefer d/b/a United Stand Moving, Employer, and AMERCO/U-HAUL International, Employer, and New Hampshire Insurance Company, Carrier for AMERCO/U-HAUL International, and S.C. Workers' Compensation Uninsured Employers' Fund, Respondents.  
WCC File No.: 1023143

Dear Ms. Kitchings:

Please find enclosed the original and six copies of **Motion for Extension of Time to File Initial Reply Brief and Designation of Matter** for filing in the above-referenced matter. I have also enclosed our firm's check in the amount of Twenty-Five (\$25.00) Dollars as payment of the required filing fee.

By copy of this letter and enclosure to Kristian M. Cross and Lisa C. Glover, counsel of record for the Respondents, and Sean Unterkoefer (Pro Se Respondent), we are serving each with a copy of our **Motion for Extension of Time to File Initial Reply Brief and Designation of Matter** as indicated by the attached Proof of Service.

Thank you for your assistance in this matter. Please contact us with any questions or if further information is needed from our office.

With kindest regards, I am

Yours very truly,

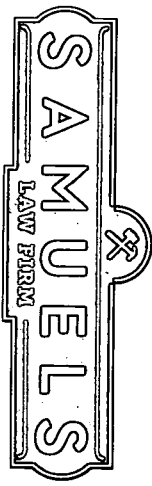
Stephen B. Samuels  
Attorney for Appellant

SBS/arh

cc: Kristian M. Cross, Esquire  
Lisa C. Glover, Esquire  
Sean Unterkoefer  
Natasha M. Hanna, Esquire

RECEIVED  
APR 07 2014  
SC COURT OF APPEALS

WE WORK FOR THE PEOPLE WHO WORK.



1320 RICHLAND STREET  
COLUMBIA, SC 29201

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumpter Street  
Columbia, SC 29201

APR 07 2014  
COLUMBIA, SC



UNITED STATES POSTAGE  
FIRST CLASS  
\$002.03  
0000522007 APR 03 2014  
MAILED FROM ZIP CODE 29201