

72166

**RECEIVED**

MAY 12 2014

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Appellate Case No.: 2014-000454

Paula Russell, Appellant,

v.

Wal-Mart Stores, Inc., and  
American Home Assurance,  
Respondents.

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

Appellant respectfully moves this Court for an Order granting her an additional extension of time in which to file and serve her Initial Brief for the above-captioned appeal. Appellant received the copy of the hearing transcript on April 16, 2014, making the deadline for Appellant's Initial Brief on May 16, 2014. The current deadline to file the initial brief is May 16, 2014.

Counsel projects he will need an additional thirty (30) days from the May 16, 2014 deadline, with a new requested deadline of June 15, 2014. Accordingly, Appellant requests an extension of the time for filing and serving her brief until such a time counsel is able to complete the brief. Counsel for the Respondents has graciously consented to this motion.

Appellant counsel greatly appreciates the Court's time, attention and assistance with regard to this request.

Respectfully submitted,



---

William A. Jordan, III

S.C. Bar #: 101271

[William@williamjordan.org](mailto:William@williamjordan.org)

622 Wade Hampton Boulevard

PO Box 1687

Greenville, South Carolina 29609

(864) 235-0147

Attorney for Appellant

Greenville, South Carolina

Date: May 7, 2014

BEFORE THE SOUTH CAROLINA  
WORKERS' COMPENSATION  
COMMISSION  
COURT OF APPEALS

**RECEIVED**  
MAY 12 2014  
**SC Court of Appeals**

Paula Russell,

Appellant,

vs.

WalMart Associates, Inc.,

Illinois National Insurance Company,

Respondents.

WCC FILE NO: 0917785

**CERTIFICATE OF SERVICE**

I, the undersigned Attorney of the Jordan Law Center, attorneys for the Appellant, do hereby certify that I have served the Respondent's Counsel with a copy of the enclosed Appellant's Motion for Extension of Time to File Initial Brief, mailing a copy of the same by United States Mail, postage prepaid, to the following address: Johnnie W. Baxley, III, 421 Wando Park Blvd., Mount Pleasant, South Carolina 29464 and C. Daniel Vega, 1510 Calhoun Street, Columbia, SC 29201.



---

William A. Jordan, III  
S.C. Bar #: 101271  
[William@williamjordan.org](mailto:William@williamjordan.org)  
622 Wade Hampton Boulevard  
PO Box 1687  
Greenville, South Carolina 29609  
(864) 235-0147

Attorney for Appellant

May 7, 2014

Greenville, South Carolina



# Jordan Law Center

Attorney William Jordan

Attorney William A. Jordan, III    Attorney Brian T. Smith\*

May 7, 2014

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

**RE: Paula Russell, Appellant, v. Wal-Mart Stores, Inc., and American Home Assurance, Respondents, WCC File No: 0917785**

Dear Ms. Kitchings:

Enclosed for filing please find the original and six (6) copies of the Appellant's Motion for Extension of Time to File Initial Brief. I have also enclosed our \$25.00 check representing payment of the filing fee for same. Also enclosed please find the original Certificate of Service in the above case.

Sincerely,

William A. Jordan, III – S.C. Bar #101271  
Jordan Law Center  
622 Wade Hampton Boulevard  
Greenville, S.C. 29609  
(864)235-0147  
(864)467-9349 (fax)  
William@williamjordan.org  
Attorney for Appellant

cc: Johnnie W. Baxley, III  
421 Wando Park Boulevard, Suite 100  
Mount Pleasant, South Carolina 29464  
(843) 284-1080  
Attorney for Respondent

C. Daniel Vega  
1510 Calhoun Street  
Columbia, S.C. 29201  
(803) 929-3600  
Attorney for Appellant

**RECEIVED**

MAY 12 2014

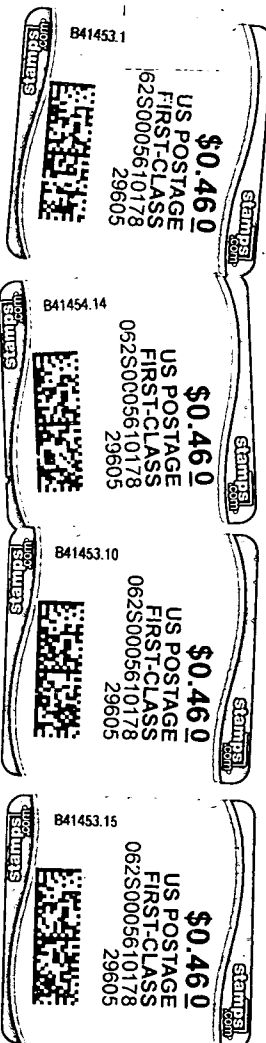
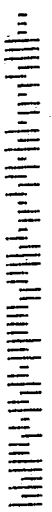
**SC Court of Appeals**

622 Wade Hampton Boulevard Greenville, SC 29609  
(Office) 864.235.0147      (Fax) 864.467.9349

www.williamjordan.org

\*Associated Counsel





# Jordan Law Center



622 Wade Hampton Boulevard Greenville, SC 29609

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

**RECEIVED**

MAY 12 2014

**SC Court of Appeals**