

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

73690

WCC File No. 0822640

Thomas Contreras, Employee/Claimant, ..... Appellant,

v.

St. John's Fire District, Employer, and State Accident Fund, Carrier, ..... Respondents.

**THIRD MOTION FOR EXTENSION OF TIME TO FILE INITIAL 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 September 29, 2014. If the Motion is granted, the due date will be extended to October 20, 2014. As grounds for granting this Motion, Appellant would show additional time is needed as several other appellate briefs and petitions became due during the past week, some unexpectedly based on the Court issuing opinions.

**Counsel for Respondents has graciously consented to this extension of time as shown by the attached email.**

Respectfully Submitted,



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

Gary Christmas  
Howell & Christmas, LLC  
P.O. Box 1896  
Mt. Pleasant, SC 29465  
(843) 849-2800  
Attorneys for the Claimant

Columbia, South Carolina  
September 26, 2014

**RECEIVED**

SEP 29 2014

**SC Court of Appeal**

## Stephen Samuels

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**From:** Peggy Urbanic <PUrbanic@clawsonandstaubes.com>  
**Sent:** Friday, September 26, 2014 8:03 AM  
**To:** Stephen Samuels  
**Subject:** RE: Contreras v. St. Johns Fire District

No objection to an extension.

Thanks

Peggy

**Margaret M. Urbanic**  
Licensed in SC

**126 Seven Farms Drive, Suite 200 | Charleston SC | 29492-8144**  
**Phone: 843 577 2026 | Fax: 843 722 2867 | Mobile: 843 224 2411**

**Website:** [www.clawsonandstaubes.com](http://www.clawsonandstaubes.com) | **Email:** [purbanic@clawsonandstaubes.com](mailto:purbanic@clawsonandstaubes.com) | **Follow us:** [Facebook](#)  
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**From:** Stephen Samuels [mailto:[stephen@samuelslawfirm.net](mailto:stephen@samuelslawfirm.net)]  
**Sent:** Thursday, September 25, 2014 5:46 PM  
**To:** Peggy Urbanic  
**Subject:** Contreras v. St. Johns Fire District

Peggy:

Good evening and hope things are going well for you.

As you know, I am writing the Appellant's Brief in Contreras v. St. Johns Fire District. I had expected to complete it by the current September 29<sup>th</sup> deadline. However, between the normal press of a solo practice and having to suddenly write briefs and petitions in three other cases (Colonna; Fore; and Dozier), I have fallen behind.

I have already been given two extensions (90 days) by the Court, so I believe the Court would prefer the Respondents' Consent before granting another extension. Would you be kind enough to consent to 20 more days? That would make the brief due on October 20<sup>th</sup>. If this is agreeable to you, a letter or separate e-mail I can attach to the Motion would be great.

Thanks for your help.

Stephen B. Samuels  
Samuels Law Firm, LLC  
1320 Richland Street

Columbia, SC 29201  
803.779.4000 Office  
803.779.4004 Fax

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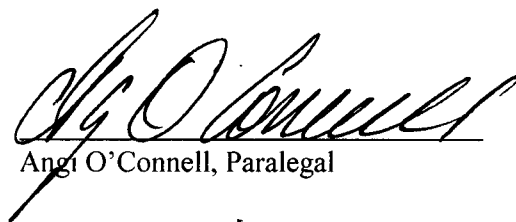
**PROOF OF SERVICE**

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I certify that I am the paralegal to Stephen B. Samuels and I have served the **THIRD MOTION FOR EXTENSION OF TIME TO FILE INITIAL 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:

Margaret M. Urbanic, Esquire  
Clawson & Staubes  
126 Seven Farms Dr., Suite 200  
Charleston, South Carolina 29492

Ellen Goodwin, Esquire  
State Accident Fund  
P.O. Box 102100  
Columbia, South Carolina 29221

  
Angi O'Connell, Paralegal

Columbia, South Carolina  
September 26, 2014

**RECEIVED**

SEP 29 2014

**SC Court of Appeals**



STEPHEN B. SAMUELS  
ATTORNEY AT LAW

September 26, 2014

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

RE: Thomas Contreras v. St. John's Fire District  
WCC File No. 0822640

Dear Ms. Kitchings:

Please find enclosed the original and six copies of our **Third Motion for Extension of Time to File Appellant's Initial 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 to Margaret M. Urbanic and Ellen Goodwin, we are serving each with a copy of our **Third Motion for Extension of Time to File Appellant's Initial 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

SBS/aro

Enclosures

cc w/encl.: Ellen Goodwin, Esquire  
Margaret M. Urbanic, Esquire  
Mr. Gary Christmas, Esquire

**RECEIVED**

SEP 29 2014

**SC Court of Appeals**

WE WORK FOR THE PEOPLE WHO WORK.