

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission
Appellate Panel

4-1042

Appellate Case No. 2014-001816

Clarence Winfrey, Employee, Appellant,

v.

Archway Services, Inc., Employer,
and American Fire & Casualty Insurance
Company, Carrier, Respondents.

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NOV 03 2014

MOTION FOR EXTENSION OF TIME

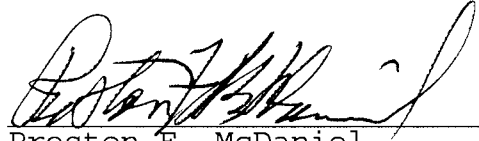
SC Court of Appeals

With the consent and agreement of Respondents' Counsel, the Appellant respectfully requests a thirty (30) day extension of time from the current due date of November 10, 2014 to file his Initial Brief and Designation of matter to be included in the Record on Appeal thus making the Brief and Designation of Matter due on or after December 10, 2014. Due to unforeseen conflicts, scheduling and work load, the Appellant has not had adequate time to properly prepare the Brief and Designation as of this date and between October 31 and November 10, has an argument before this Honorable Court, multiple days of in and out of town depositions and mediation preparation. Appellant's Counsel has set aside November 10th and 11th for preparation of the Briefs due to the Court. The Appellant would hereby request that the Court consider

setting the due date for either Friday December 12th or Monday
December 15th.

Respectfully submitted,

Dated: October 31, 2014



Preston F. McDaniel
MCDANIEL LAW FIRM
1315 Elmwood Avenue
Columbia, South Carolina 29201
(803) 771-7211
Attorney for Appellant

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In the Court of Appeals

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APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

SC Court of Appeals

Appellate Case No. 2014-001816

Clarence Winfrey, Employee, Appellant,

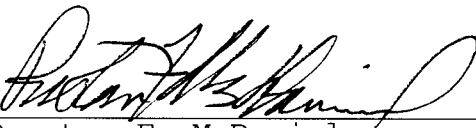
v.

Archway Services, Inc., Employer,
and American Fire & Casualty Insurance
Company, Carrier, Respondents.

PROOF OF SERVICE

I certify that I have served the **MOTION FOR EXTENSION OF TIME** by depositing a copy of it in the United States Mail, postage prepaid, on October 31, 2014 addressed to: Brett H. Bayne, Esquire, McAngus, Goudelock & Courie, Post Office Box 12519, Columbia, SC 29211.

Dated: October 31, 2014



Preston F. McDaniel
MCDANIEL LAW FIRM
1315 Elmwood Avenue
Columbia, South Carolina 29201
(803) 771-7211

Attorney for Appellant

McDANIEL LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW
1315 ELMWOOD AVENUE
COLUMBIA, SOUTH CAROLINA 29201

Proudly representing injured workers
for over 30 years.

Preston F. McDaniel

Matthew Robertson

RECEIVED 771-7211

Facsimile (803) 252-0709
NOV 03 2014

October 31, 2014

SC Court of Appeals

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

**RE: Clarence Winfrey, Employee, Appellant, v. Archway
Services, Inc., Employer, and American Fire &
Casualty Insurance Co., Carrier, Respondents.
Appellate Case No.: 2014-001815**

**Clarence Winfrey, Employee, Appellant, v. Archway
Services, Inc., Employer, and American Fire &
Casualty Insurance Co., Carrier, Respondents.
Appellate Case No.: 2014-001816**

Dear Ms. Kitchings:

Please find attached my request (Motion) for an additional thirty (30) days extension to which Brett Bayne, Counsel for the Respondents, has graciously agreed as to the two appeals in the above-referenced matter. As noted, there are actually two (2) separate appeals due in this same matter from two separate final Decisions of the Workers' Compensation Commission.

While the Motions are self-explanatory as to the reasons for this extension request, just to expand, almost simultaneously with the time that I filed my initial request for an extension, we received notice of a date certain for argument in the SC Court of Appeals, multiple workers' compensation hearings, Notices of Depositions and required mandatory mediation notices all to be set at the end of October and in November. As the Court knows, I am basically a sole practitioner, although I have one Associate now, and I have literally had just several days in the office to handle all of the other matters in reference to my clients. As noted in the Motion, I have set aside two specific full days out of the office for doing the Briefs and the Designations.

The Honorable Jenny Abbott Kitchings

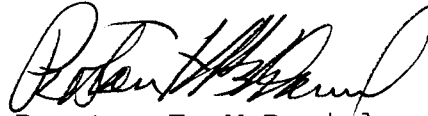
October 31, 2014

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Also, because this will now make Mr. Bayne's Briefs due right after the Christmas and New Year's holidays and because nothing is more important than family and friends, I hereby note to the Court that I will have no objection to Mr. Bayne having an extension if he needs one at that time.

As always, I appreciate all the courtesies and kindnesses shown to me by the Court and by copy of this letter, I am notifying and serving Mr. Bayne with a copy of the Motions. I am also enclosing the \$25.00 filing fee for each Motion.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Preston F. McDaniel". The signature is fluid and cursive, with a large initial "P" and "M".

Preston F. McDaniel

PFM/kth
Enclosures

cc: Brett H. Bayne, Esquire



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

