

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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DEC 01 2014
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 0717624

Hector G. Fragosa, Employee/Claimant, Appellant,

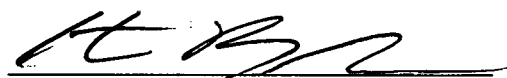
v.

Kade Construction, LLC, Employer, and Key Risk Management Services, Inc.,
Carrier, Respondents.

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

Appellant, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-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 is currently due on November 26, 2014. If the extension is granted, the Brief will be due on December 26, 2014. As grounds for this Motion, Appellant would show additional time is needed as Counsel has multiple matters pending before this Court many of which require the filing of briefs.

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Attorneys for Appellant

Columbia, South Carolina
November 26, 2014

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PROOF OF SERVICE

I certify that I, Katherine Carter, am a paralegal to Stephen B. Samuels and I have caused the **Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter** to be served on the parties below, by placing 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:

Michael W. Burkett, Esquire
J. Gabriel Coggiola, Esquire
Willson Jones Carter & Baxley, P.A.
4500 Fort Jackson Boulevard
Columbia, South Carolina 29209

The Honorable Amy Bracy
Judicial Director
S.C. Workers' Compensation Commission
Post Office Box 1715
Columbia, South Carolina 29202-1715



Katherine R. Carter
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Columbia, South Carolina
November 26, 2014



STEPHEN B. SAMUELS
ATTORNEY AT LAW

November 26, 2014

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

RE: Hector G. Fragosa v. Kade Construction, LLC, et. al.
Appellate Case No.: 2014-002354

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter and Proof of Service**, in the above case. Also enclosed is the filing fee for the Motion of \$25.00.

Please have your staff clock in the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter and Proof of Service and return a clocked copy in the enclosed self addressed stamped envelope.

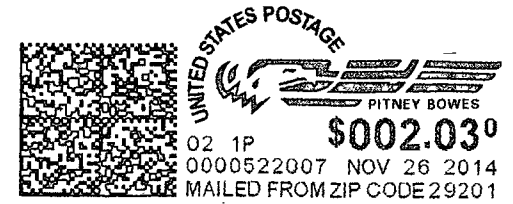
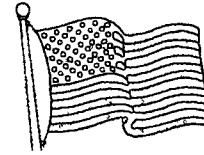
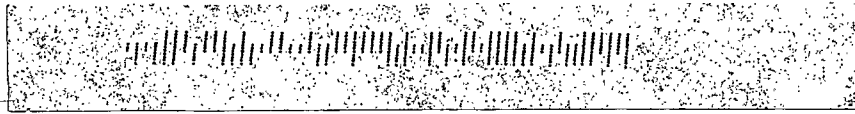
Sincerely,

Katherine R. Carter
Paralegal for Stephen B. Samuels

SBS/krc
Enclosures

cc w/encl.: Michael W. Burkett, Esquire
Amy Bracy, SCWCC
Jeffrey C. Chandler, Esquire

WE WORK FOR THE PEOPLE WHO WORK.



1320 RICHLAND STREET
COLUMBIA, SC 29201

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