

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

74914

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

RECEIVED

JAN 30 2015

SC Court of Appeals

Appellate Case No.: 2014-001217

Thomas Contreras, Employee/Claimant, Appellant,

v.

St. Johns Fire Department, Employer, and
State Accident Fund, Carrier, Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL REPLY BRIEF AND
RETURN TO RESPONDENTS' MOTION TO DISMISS**

Appellant, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Reply Brief of Appellant and the Return to Respondents' Motion to Dismiss.

The Initial Brief of Respondent was actually received by Appellant via U.S. Mail on January 27, 2015. Respondents inadvertently served their Brief to a post office box that is no longer an active address for Appellant's attorney. The Certificate of Service differs from the envelope in that the Certificate of Service shows Appellant's attorney's correct street address.

Based on the certificate of service (not actual receipt) the Return and Initial Reply Brief are currently due on January 29, 2015. If the extension is granted, the Brief will be due on February 27, 2015. As grounds for this Motion, Appellant would show additional time is needed as:

1. Respondents' Brief and Motion were not received until January 27, 2015.

2. Appellant has appellate briefs due in other matters pending before this Court and the South Carolina Supreme Court in the following matters:

- A. Miles v. Waffle House – due February 13, 2015.
- B. Fragosa v. Kade Construction – due February 9, 2015.
- C. Warner v. Gallman Personnel Services - Due February 2, 2015.

3. Counsel for Respondents' consents to the extension of time.

Respectfully Submitted:



Stephen B. Samuels
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29250
(803) 779-4000

stephen@samuelslawfirm.net

Gary Christmas, Esq.
Howell & Christmas, LLC
Post Office Box 1896
Mt. Pleasant, SC 29465

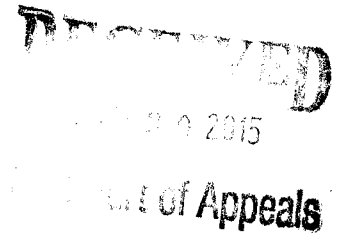
Attorneys for Appellant

January 28, 2015
Columbia, South Carolina

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Workers' Compensation Commission

Appellate Case No.: 2014-001217



Thomas Contreras, Employee/Claimant, Appellant,

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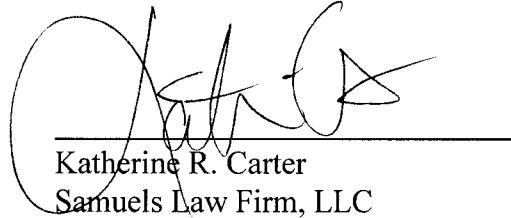
PROOF OF SERVICE

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 Reply Brief and Return to Respondents' Motion to Dismiss** 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:

Margaret M. Urbanic
Clawson and Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492-8144

Ellen Goodwin
State Accident Fund
PO Box 102100
Columbia, SC 29221

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

A handwritten signature in black ink, appearing to read 'K. Carter', is written over a solid horizontal line. The signature is stylized and cursive.

Katherine R. Carter
Samuels Law Firm, LLC
1320 Richland Street
Columbia, SC 29250
(803) 779-4000
Katherine@samuelslawfirm.net

Columbia, South Carolina
January 28, 2015



STEPHEN B. SAMUELS
ATTORNEY AT LAW

January 28, 2015

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

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JAN 30 2015
SC Court of Appeals

RE: Thomas Contreras v. St. Johns Fire Department
Appellate Case No.: 2014-001217

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 Reply Brief and Return to Respondents' Motion to Dismiss 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 Reply Brief and Return to Respondents' Motion to Dismiss, and Proof of Service and return a clocked copy in the enclosed self addressed stamped envelope.

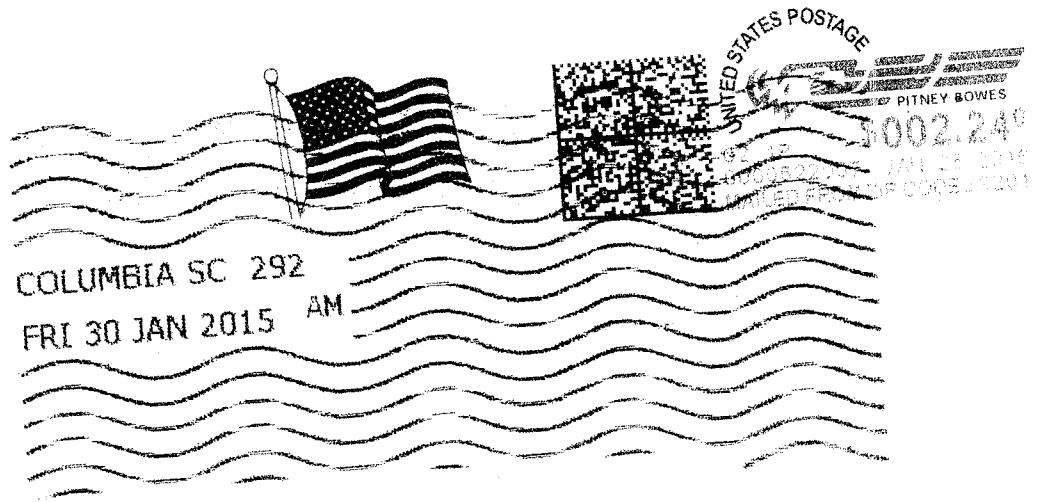
Sincerely,

Katherine R. Carter
Paralegal for Stephen B. Samuels

SBS/krc
Enclosures

cc w/encl.: Margaret Urbanic, Esq.
Ellen Goodwin, Esq.
Gary Christmas, Esq.

WE WORK FOR THE PEOPLE WHO WORK.



COLUMBIA SC 292
FRI 30 JAN 2015 AM

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