

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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FEB 09 2015

SC Court of Appeals

75064

APPEAL FROM SUMTER COUNTY
Court of Common Pleas

The Honorable W. Jeffrey Young, Circuit Court Judge

C.A. No.: 2013-CP-43-02284
WCC File No.: 9930459

Arrowpoint Capital Corporation/Arrowood Indemnity Co., CarrierAppellant,

v.

South Carolina Second Injury Fund, Carrier Respondent,

In re:

Mary McConico, Employee/Claimant

v.

Yuasa-Exide, Inc., Employer and Arrowpoint Capital Corp./Arrowood Indemnity Co., Carrier.

**NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME IN WHICH TO
FILE INITIAL BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN
THE RECORD ON APPEAL**

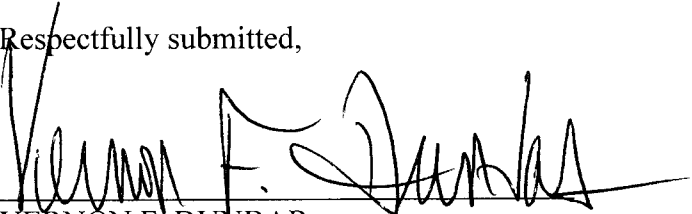
TO: THE HONORABLE JENNY ABBOTT KITCHINGS, CLERK OF COURT OF THE
SOUTH CAROLINA COURT OF APPEALS; and TIMOTHY b. KILLEN, ESQUIRE,
ATTORNEY FOR SOUTH CAROLINA SECOND INJURY FUND, RESPONDENT.

Arrowpoint Capital Corporation, Appellant, respectfully requests additional time in
which to the Initial Brief and Designation of Matters to be Included in the Record on Appeal in
this matter. Appellant's Initial Brief and Designation of Matters is due to be filed on February 9,

2015. Because of a pending trial and a recent bout with the flu, counsel for Appellant has been unable to complete and file the Initial Brief and Designation of Matters.

Accordingly, counsel for Appellant respectfully requests that this Court permit him to submit and file the Initial Brief and Designation of Matters to be Included in the Record on Appeal within thirty (30) days or on or before March 11, 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Vernon F. Dunbar", written over a horizontal line.

VERNON F. DUNBAR
MCANGUS GOUDELOCK & COURIE, L.L.C.
Post Office Box 2980
55 East Camperdown Way, Suite 300
Greenville, South Carolina 29602
(864) 239-4000
Attorneys for the Appellant

Greenville, South Carolina
February 6, 2015

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM SUMTER COUNTY
Court of Common Pleas

The Honorable W. Jeffrey Young, Circuit Court Judge

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Arrowpoint Capital Corporation/Arrowood Indemnity Co., CarrierAppellant,

v.

South Carolina Second Injury Fund, Carrier Respondent,

In re:

Mary McConico, Employee/Claimant

v.

Yuasa-Exide, Inc., Employer and Arrowpoint Capital Corp./Arrowood Indemnity Co., Carrier.

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at MCANGUS GOUDELOCK & COURIE, and that she has served, on the date set forth below, a copy of the document described below, in the above entitled action to the following persons, pursuant to Section 15-9-930 and Section 15-9-940 of the Code of Laws of South Carolina, 1976, by depositing a copy of same in the United States Mail, postage prepaid, addressed to:

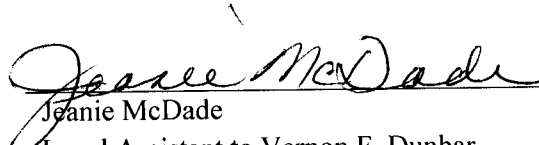
Timothy B. Killen, Esquire
Wilson, Jones, Carter & Baxley
4500 Fort Jackson Boulevard
Columbia, South Carolina 29209

Honorable James C. Campbell, Jr.
Sumter County Clerk of Court
141 North Main Street Rm 308
Sumter, SC 29150-4965

Judge W. Jeffery Young
215 N. Harvin Street
Sumter, SC 29150

DOCUMENT: Notice of Motion and Motion for Extension of Time In Which
To File Initial Brief and Designation of Matters to be Included
In The Record On Appeal

DATE OF MAILING: February 6, 2015



Jeanie McDade
Legal Assistant to Vernon F. Dunbar

Reply To

VERNON F. DUNBAR
Direct Dial: (864) 239-6735
vernondunbar@mgclaw.com

February 5, 2015

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FEB 09 2015

SC Court of Appeals

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

RE: Arrowpoint Capital Corporation v. SC Second Injury Fund
Mary McConico v. Yuasa-Exide and Arrowpoint Capital Corporation
Appellate Case No.: 2014-002215
Lower Court No.: 2013-CP-43-02284
Our File No.: 20113.14073

Dear Ms. Kitchings:

Please find enclosed a Notice of Motion and Motion Requesting a 30-Day Extension in which to file Appellant's Initial Brief and Designation of Matters to be Included in the Record on Appeal. In accordance with the Court rules, I am hereby filing the original and seven (7) copies of this Motion.

Please return a filed and stamped copy of this Motion to me in the self-addressed, stamped envelope which I have enclosed for your use. Additionally, I am enclosing the required \$25.00 filing fee for this Motion.

By copy of this letter to Timothy Killen, Attorney for Respondent, South Carolina Second Injury Fund, I am apprising him of my communication with you and serving a copy of this Motion upon him.

With kind and warm regards, I remain

Very truly yours,


Vernon F. Dunbar

VFD/jm

Enclosures: Notion of Motion and Motion
Certificate of Service
Filing Fee / SASE

cc: Timothy Killen, Wilson, Jones, Carter & Baxley (w/enclosures)
Eric Rowell, Arrowpoint Capital Corp (w/enclosures) **SENT VIA EMAIL**
Renee Wray, Arrowpoint Capital Corporation (w/enclosures) **SENT VIA EMAIL**

mgc

**INSURANCE
DEFENSE**

POST OFFICE BOX 2880
GREENVILLE, SC 29602

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FEB 09 2015

SC Court of Appeals

20113.14073/VFD/jm
The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201