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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC FILE NO.: 1206355

Frances Baron, Employee, Appellant,

v.

Sanctuary Hospice, Employer, and
Guarantee Insurance Company c/o
Patriot National Insurance Group, Carrier, Respondents.

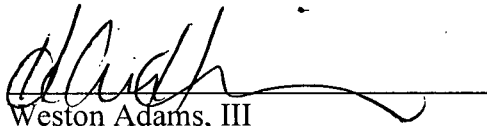
**MOTION FOR
CONTINUANCE OF ORAL ARGUMENT**

Pursuant to Appellate Rule 240, SCACR, Respondents Sanctuary Hospice and Guarantee Insurance Company c/o Patriot National Insurance Group hereby move the Court for a continuance of the oral argument that is scheduled for April 23, 2015 in this appeal. Respondents and Appellant are in the process of negotiating a settlement, and have mediation scheduled for April 6, 2015. As Appellant is over 65 years of age, part of any settlement in this matter will involve a Workers' Compensation Medicare Medical-Set-Aside ("MSA"), which will take time to prepare and have approved. Assuming the parties are able to settle this matter, it is likely that the MSA will not be finally approved before April 23, 2015. Therefore, Respondents request that oral argument in this appeal be continued to the next term of court.

Counsel for Appellant Frances Baron has advised that they consent to the continuance.

Respectfully submitted,
McANGUS GOUDELOCK & COURIE, LLC

March 18, 2015



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PROOF OF SERVICE

I certify that on the 18th day of March 2015, I served the Respondents' **Motion for Continuance of Oral Argument** on Frances Baron by depositing a copy of it in the United States Mail, postage prepaid, addressed to her attorney of record:

William G. Jenkins, Jr., Esq.
Post Office Box 6855
Hilton Head Island, SC 29938



Jami Richards
Legal Assistant to Helen F. Hiser
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*Attorneys for Respondents Sanctuary Hospice and
Guarantee Insurance Company c/o Patriot National
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mgc

Reply To

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March 18, 2015

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SC Court of Appeals

Via U.S. Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Frances Baron vs. Sanctuary Hospice and Guarantee Insurance Company
c/o Patriot National Insurance Group
Date of Accident: May 21, 2012
WCC File No.: 1206355
Our File No.: 20748.12021
Claim No.: 319-111-165
Appeal Tracking No.: 2013-002666

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondents' Motion for Continuance of Oral Argument, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the self-addressed, stamped envelope. Also enclosed is our firm's check in the amount of \$25 for filing the motion.

If you have any questions, please do not hesitate to contact me.

Yours truly,

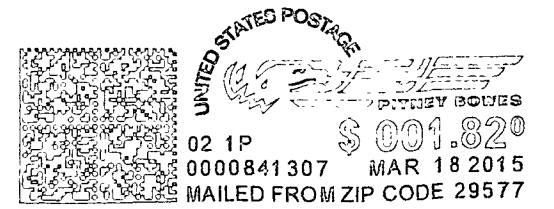
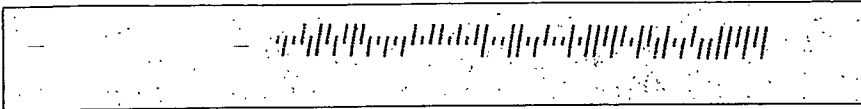
McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: William G. Jenkins, Jr., Esq.
Sarah Armstrong, Patriot National Insurance Group
Penny Abbott, Sanctuary Hospice



mgc

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20748.12021/HFH/jlr

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
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Columbia, South Carolina 29211