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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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MAR 18 2015

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

**SC Court of Appeals**

WCC File No. 0717624

Hector G. Fragosa, Employee/Claimant, ..... Appellant,

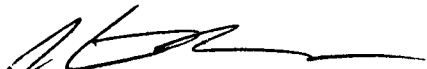
v.

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

**MOTION FOR EXTENSION OF TIME TO FILE  
APPELLANT'S INITIAL REPLY BRIEF**

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. The Brief is currently due on March 21, 2015. If the extension is granted, the Brief will be due on April 20, 2015. 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  
March 16, 2015

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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** 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

  
Katherine R. Carter

Columbia, South Carolina  
March 16, 2015



STEPHEN B. SAMUELS  
ATTORNEY AT LAW

March 16, 2015

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**SC Court of Appeals**

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 Reply Brief and Proof of Service**, in the above case.

Please have your staff clock in the Motion for Extension of Time to file Appellant's Initial Reply Brief and Proof of Service and return the clocked copies in the enclosed self-addressed stamped envelope.

Sincerely,  
SAMUELS LAW FIRM, LLC

Katherine R. Carter  
Paralegal for Stephen B. Samuels

/krc

Enclosure(s) as stated

cc: Michael W. Burkett, Esquire  
Jeffrey C. Chandler, Esquire

WE WORK FOR THE PEOPLE WHO WORK.

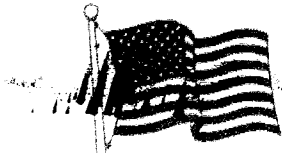
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