

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Lower Court Case No. 1004913
Appellate Case No. 2013-00274

RECEIVED

APR 2 2015

S.C. Supreme Court

Virginia (Ginny) A. Miles, Employee, Petitioner,

v.

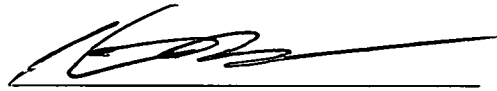
Waffle House, Inc., Employer, and
Brentwood Services, Inc., Carrier Respondents.

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

Petitioner, by and through her undersigned attorney hereby moves before this Honorable Court for a 10-day extension in which to file the Reply Brief of Petitioner. The Brief of Respondents has not been received by the Petitioner, based on the Supreme Court's website, the Brief was mailed on March 23, 2015, and filed by the Court on March 25, 2015. Counsel for the Respondents inadvertently served their Brief to a post office box and street address that are no longer active addresses for Petitioner's attorney, and to date counsel for the Petitioner has not received the Brief of Respondents.

Based on the certificate of service (not actual receipt) the Reply Brief is currently due on April 2, 2015. If the extension is granted, the Brief will be due on April 13, 2015. As grounds for this Motion, Petitioner would show additional time

is needed as the Brief of Respondents was not properly served and, to date, has not been received.



Stephen B. Samuels
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Attorney for Petitioner

Columbia, South Carolina
April 2, 2015

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v.

Waffle House, Inc., Employer, and
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PROOF OF SERVICE

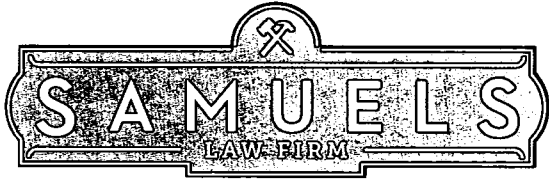
I certify that I, Katherine Carter, the undersigned paralegal to Stephen B. Samuels have caused a copy of the **MOTION FOR EXTENSION OF TIME TO FILE PETITIONER'S REPLY BRIEF**, to be served, via first class mail and addressed to the attorneys for Respondents as indicated below:

Weston Adams, III, Esquire
McAngus Goudelock & Courie, LLC
Post Office Box 12519
Columbia, South Carolina 29211-2519

Helen F. Hiser, Esquire
McAngus Goudelock & Courie, LLC
Post Office Box 650007
Mount Pleasant, South Carolina 299465


Katherine Carter

April 2, 2015



STEPHEN B. SAMUELS
ATTORNEY AT LAW

April 2, 2015

Via Hand Delivery

The Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
Post Office Box 11330
Columbia, South Carolina 29211

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APR 2 2015
S.C. Supreme Court

RE: Virginia Miles v. Waffle House, Inc. and Brentwood Services, Inc.
Appellate Case No.: 2013-000274

Dear Mr. Shearouse:

Enclosed for filing please find the original and seven (7) copies of Motion for Extension of Time to File Petitioner's Reply Brief. Also enclosed is the Proof of Service showing service upon the attorneys for the Respondents. Please have your staff file the original and copies, and return a clocked copy to my office with my courier.

If you have any questions or concerns, please feel free to call me. Thank you for your assistance in this matter.

With kindest regards, I am

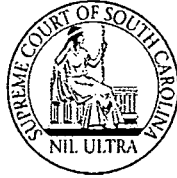
Yours very truly,

Stephen B. Samuels

SBS/krc
Enclosure(s) as stated

cc: Weston Adams, III, Esquire
Helen F. Hiser, Esquire

WE WORK FOR THE PEOPLE WHO WORK.



The Supreme Court of South Carolina

Samuels Law Firm

04/02/2015

RECEIPT #75576

Case No: 2013-000274
Case Short Title: Virginia Miles v. Waffle House
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 6244
Check/Money Order Date: 04/01/2015
Comments: