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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 0717624

Hector G. Fragosa, Employee/Claimant, Appellant,

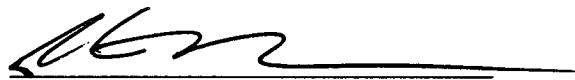
v.

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

**SECOND 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 7-day extension in which to file the Initial Reply Brief of Appellant. The Brief is currently due on April 22, 2015. If the extension is granted, the Brief will be due on April 29, 2015. As grounds for this Motion, Appellant would show additional time is needed as Counsel has a much longer brief due on April 23, 2015 in the South Carolina Supreme Court. Appellant would further show he is a solo practitioner and Respondents have consented in writing per the attached letter.

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Attorneys for Appellant

Columbia, South Carolina
April 20, 2015

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SC Court of Appeals

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APPEAL FROM SOUTH CAROLINA
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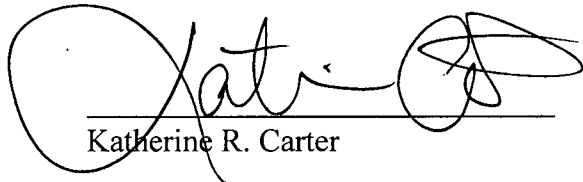
v.

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

PROOF OF SERVICE

I certify that I, Katherine Carter, am a paralegal to Stephen B. Samuels and I have caused the **Second 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
April 20, 2015

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SC Court of Appeals

WILLSON JONES CARTER & BAXLEY, P.A.

ATTORNEYS AT LAW

GREENVILLE CHARLESTON COLUMBIA CHARLOTTE RALEIGH ATLANTA

Michael W. Burkett
Direct (803) 227-2886
Fax (803) 782-2527
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Columbia, SC 29209
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April 20, 2015

VIA EMAIL

Stephen B. Samuels, Esquire
Samuels Law Firm, LLC
1320 Richland Street
Columbia, SC 29201

Re: Hector Fragosa vs. Kade Construction, LLC
WCC File No.: 0717624 DOI: 11/1/2007
Carrier: Key Risk Management - Claim No.: 1000021953
WJC&B File No.: 0310.00420

Dear Stephen:

This letter follows our conversation confirming the Defendants/Respondents have agreed to a seven (7) day extension for your Reply Brief. Thank you for your attention to this matter, and please do not hesitate to contact me if you have any questions or concerns.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

Michael Burkett

Michael W. Burkett

MWB/mjl

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SC Court of Appeals



STEPHEN B. SAMUELS
ATTORNEY AT LAW

April 20, 2015

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 **Second 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 Second 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

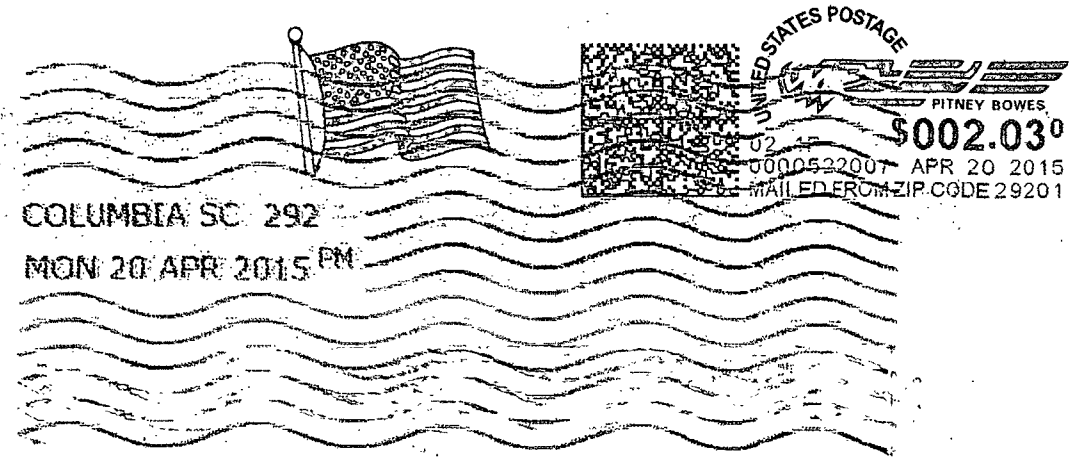
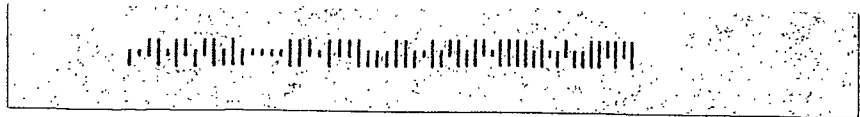
/krc

Enclosure(s) as stated

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

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SC Court of Appeals

WE WORK FOR THE PEOPLE WHO WORK.



COLUMBIA SC 292

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1320 RICHLAND STREET
COLUMBIA, SC 29201

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

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