

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APR 23 2015

SC Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No: 2013-001896  
WCC File No. 1023143

George Ferguson..... Claimant/Appellant.

v.

New Hampshire Insurance Company, Carrier for AMERCO/U-HAUL  
International, Sean Unterkoefer d/b/a United Stand Moving,  
Employer, and the S.C. Workers' Compensation  
Uninsured Employers' Fund ..... Defendants/Respondents.

**MOTION FOR EXTENSION OF TIME  
TO FILE RESPONDENTS' RETURN TO  
APPELLANT'S PETITION FOR REHEARING**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT  
OF APPEALS:

Pursuant to Rule 240, SCACR, Respondents AMERCO/U-HAUL  
International and New Hampshire Insurance Company (collectively  
"Respondents"), by and through their undersigned counsel, and with the  
consent of the Appellant, respectfully move this Court for an Order granting

them an extension of time in which to file the Respondents' Return to Appellant's Petition for Rehearing. This is Respondents' first request for extension. The deadline to file and serve Respondents' Return to Appellant's Petition for Rehearing was due today, April 23, 2015. Respondents respectfully request an additional ten (10) days in which to file and serve Respondents' Return to Appellant's Petition for Rehearing, which would make the deadline Monday, May 4, 2015.

The undersigned counsel for Respondents represent to the Court that they have been conscientious in their efforts to prepare Respondents' Return to Appellant's Petition for Rehearing; however, because of the number and complexity of the issues extant in the instant case, and the lead counsel, Christian Stegmaier, is out of state in meetings, the undersigned has not been able to complete the Respondents' Return to Appellant's Petition for Rehearing. Counsel for Respondents' represents to this Court she has advised and conferred with Counsel to Appellant, who voices no objection to Respondents' pursuant of this request. Counsel for Respondents greatly appreciates the Court's time, attention, and assistance with regard to this request.

Respectfully submitted

COLLINS & LACY, P.C.

By:   
CHRISTIAN STEGMAIER (S.C. ID 68648)  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
ASHLEY R. KIRKHAM (S.C. ID 80114)  
[akirkham@collinsandlacy.com](mailto:akirkham@collinsandlacy.com)  
1330 Lady Street, Suite 601  
Post Office Box 12487  
Columbia, South Carolina 29211  
(803) 256-2660 (voice)  
(803) 771-4484 (facsimile).

**ATTORNEYS FOR RESPONDENTS  
AMERCO/U-HAUL INTERNATIONAL  
AND NEW HAMPSHIRE INSURANCE  
COMPANY**

Columbia, South Carolina  
April 23, 2015

THE STATE OF SOUTH CAROLINA  
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Uninsured Employers' Fund ..... Defendants/Respondents.

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**PROOF OF SERVICE**

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I hereby certify that I served the foregoing Motion for an Extension of  
Time to file Respondents' Return to Appellant's Petition for Rehearing upon  
all counsel, by placing a copy in the United States mail, postage prepaid, on  
February 17, 2014, to the following:


Stephen B. Samuels, Esquire  
Samuels Law Firm, LLC  
1320 Richland Street  
Columbia, SC 29201  
*Attorneys for Appellant*

Sean Unterkoefer  
United Stand Moving  
25 Wing Street  
Lisbon Falls, Maine 04252

Natasha M. Hanna, Esquire  
Law Office of Natasha M. Hanna,  
P.C.  
4717 Jenn Drive, Suite 102  
Myrtle Beach, SC 29577  
*Attorneys for Appellant*  
Lisa C. Glover, Esquire  
Uninsured Employers' Fund Division  
State Accident Fund  
Post Office Box 210039  
Columbia, SC 29221-0039

Respectfully submitted

COLLINS & LACY, P.C.

By:   
CHRISTIAN STEGMAIER (S.C. ID 68648)  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
ASHLEY R. KIRKHAM (S.C. ID 80114)  
[akirkham@collinsandlacy.com](mailto:akirkham@collinsandlacy.com)  
1330 Lady Street, Suite 601  
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**ATTORNEYS FOR RESPONDENTS  
AMERCO/U-HAUL INTERNATIONAL  
AND NEW HAMPSHIRE INSURANCE  
COMPANY**

Columbia, South Carolina  
April 23, 2015



Ashley R. Kirkham | D: 803.255.0415 | E: akirkham@collinsandlacy.com

April 23, 2015

**VIA HAND DELIVERY**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**Re: *Ferguson v. United Stand Moving/eMove***  
**Appellate Case No: 2013-001896**  
**WCC File No. 1023143**  
**C&L File No. 000511-81700**

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Respondents' Motion for Extension of Time to file and serve Respondents' Return to Appellant's Petition for Rehearing in connection with the above referenced matter. Please file the original and return a clocked copy to our courier.

By copy of this letter to counsel of record, I am serving same on them.

Thanking you for your assistance in this matter; and with kind regards, I remain

Sincerely,

  
Ashley R. Kirkham

ARK/mmm

Enclosure

cc: Stephen B. Samuels, Esquire  
Natasha M. Hanna, Esquire  
Sean Unterkoefer, Esquire  
Lisa C. Glover, Esquire

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