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THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 1023143

Opinion No. 5307 (S.C. Ct. App. filed April 1, 2015)

RECEIVED

JUL 22 2015

SC Court of Appeals

George Ferguson..... Petitioner.

v.

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

**RESPONDENTS'
MOTION FOR EXTENSION
OF TIME TO FILE
RETURN TO PETITION FOR
WRIT OF CERTIORARI**

TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA SUPREME COURT:

Pursuant to Rule 240, SCACR, Respondents respectfully move this Court for an extension of time to file the Return to Petition for Writ of Certiorari. The Return is due Wednesday, July 22, 2015; however, counsel respectfully requests an additional twenty (20) days' extension until Tuesday, August 11, 2015. Counsel asserts the extension is necessary so as to adequately respond to Petitioner's extensive and detailed petition, combined with counsel's recent travel schedule in other case matters. This is Respondents' first request for an extension. Further, counsel is mindful of this Court's recent Order In re Extensions in Cases Seeking a

Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals,
S.C. Sup. Ct. Order dated July 16, 2014, with requesting this extension. This will be the first and
only request for an extension. Accordingly, Respondents respectfully move this Court for an
Order granting an extension to serve and file the Return to Petition for Writ of Certiorari.

Respectfully submitted
COLLINS & LACY, P.C.



By: _____
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**ATTORNEYS FOR RESPONDENTS,
AMERCO/U-HAUL INTERNATIONAL AND
NEW HAMPSHIRE INSURANCE COMPANY**

Columbia, South Carolina
July 22, 2015

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Uninsured Employers' Fund..... Respondents.

PROOF OF SERVICE

I hereby certify that I served the foregoing Respondents' Motion for Extension of Time to
File the Return to Petition for Writ of Certiorari upon all counsel, by placing a copy in the United
States mail, postage prepaid, on July 22, 2015, to the following:

Stephen B. Samuels, Esquire
Samuels Law Firm, LLC
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Columbia, SC 29201
Attorneys for Petitioner

Natasha M. Hanna, Esquire
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Respectfully submitted

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

Columbia, South Carolina
July 22, 2015



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

July 22, 2015

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED

JUL 22 2015

SC Court of Appeals

Re: *Ferguson v. United Stand Moving/eMove*
Civil Action No. 2015-001330
C&L File No. 000511-81700

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the Motion for Extension of Time to File Return to Petition for Writ of Certiorari in the above-referenced matter. I am also enclosing a check in the amount of \$25.00 for the required filing fee. Please return a filed, stamped copy of the motion to me via my courier.

By copy of this letter, a copy of this letter and motion are being served upon all parties.

Respectfully,

A handwritten signature in black ink, appearing to read "C. Stegmaier".

Christian Stegmaier

CS:srm
Enclosures

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