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THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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JUL 24 2015

S.C. Supreme Court

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1023143

**RECEIVED**

JUL 22 2015

SC Court of Appeals

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

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

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM SOUTH CAROLINA  
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Unterkoefler d/b/a United Stand Moving,  
Employer, and the S.C. Workers' Compensation  
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  
1320 Richland Street  
Columbia, SC 29201  
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Uninsured Employers' Fund Division  
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Respectfully submitted

COLLINS & LACY, P.C.



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

Columbia, South Carolina  
July 22, 2015

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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,

Christian Stegmaier

CS:srm  
Enclosures

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