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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission
Appellate Panel

Appellate Case No. 2014-002416

William Lee Turner, Employee, Appellant,

v.

SAIIA Construction, Employer, and
Old Republic General Insurance Corporation
c/o Gallagher Bassett Services, Inc.,
Carrier, Respondents.

MOTION OF AN EXTENSION OF TIME
AND TO FILE LATE THE
FINAL REPLY BRIEF OF APPELLANT

TO: SC COURT OF APPEALS; HELEN F. HISER, ATTORNEY AND
JASON W. LOCKHART, ESQUIRE, COUNSEL FOR THE
RESPONDENTS:

YOU WILL PLEASE TAKE NOTICE that pursuant to SCACR Rule
240 and 263(b), the Appellant moves for an Order of the Court
for an extension of time and to late file the Final Reply
Brief of Appellant in the above-referenced matter, on the
basis that:

1. That due to an initial error by the copying
service used by Appellant's Counsel, the Supplemental Record
on Appeal was not timely filed necessitating a Motion to late

file the Supplemental Record and to file the Final Briefs thereafter.

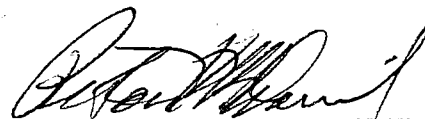
2. That while the Appellant's Final Brief was properly finalized and timely filed, the Appellant's Final Reply Brief was improperly diaried for finalization and submission to the Court and not at the same time that the Final Appellant's Brief was properly and timely served. This error was not caught until receipt of the letter from the Court on July 15th as to the filing of the Final Reply Brief of the Appellant. The Final Reply Brief is attached hereto and is incorporated herein by reference, and Appellant's Counsel would respectfully request permission to late file the document out of time particularly in light of the unusual circumstances surrounding the submission of the Supplemental Record necessary for finalization of the Briefs.

Wherein and based on the direction of the Court:

This Motion is being filed to allow for the late filing due to the mistake made by my office in this matter.

I SO MOVE.

Respectfully submitted,



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July 25, 2015

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Proudly representing injured workers
for over 30 years.

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July ²⁹~~21~~, 2015

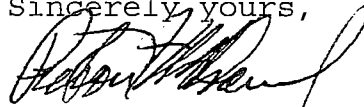
Honorable V. Claire Allen
Deputy Clerk of Court
SC Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

**RE: William Lee Turner, Employee, Appellant, v. SAIIA
Construction, Employer, and Old Republic General
Insurance Corporation c/o Gallagher Bassett Services,
Inc., Carrier, Respondents.
Appellate Case No.: 2014-002416**

Dear Ms. Allen:

Per your letter of July 15, 2015, please find attached my Motion to be allowed to late file Appellant's Final Reply Brief. As you will see from the Motion this was caused in large part by the unusual situation that came about in reference to the filing of the Supplemental Record on Appeal and the mistake that occurred when the copying service that we use failed to timely file the Supplemental Record. This compounded and in large part caused the error in my office and I am requesting permission to late file the Final Reply Brief of the Appellant in this matter. By copy of this letter, I am notifying Respondents' Counsel of this communication and request to late file. Also enclosed is the required filing fee. I will go ahead and have the original unbound and required copies of the Final Reply Brief copied and made ready for submission to the Court and will go ahead and submit those, of course, subject to the approval of the Court of this Motion. Thank you for your letter and I sincerely apologize for this mistake. I am actually glad that you notified us about this now because I was out of the office until July 13th and could not have finalized the Brief before that time.

Sincerely yours,



Preston F. McDaniel

PFM/kth
Enclosures

cc: Helen F. Hiser, Attorney at Law
Jason W. Lockhart, Esquire