

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

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JUL 31 2015

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION **SC Court of Appeals**

Full Commission Appellate Panel Order

WCC File No.: 1222136

Appellate Case No.: 2015 - 001277

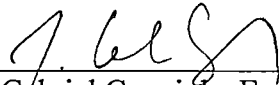
Otis Nero, (Employee/Claimant),..... Appellant,

v.

South Carolina Department of Transportation (Employer), and  
State Accident Fund (Carrier),..... Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENTS' INITIAL BRIEF**

Respondent, by and through his undersigned attorney, hereby moves before this Honorable Court of a thirteen (13) day extension in which to file Respondents' Initial Brief. The brief is currently due on August 1, 2015. If the extension is granted, Respondents' Brief will be due on August 14, 2015. As grounds for this Motion, Appellant would show that additional time is needed as Counsel has multiple matters pending before this Court, many of which require the filing of briefs. Respondents would further note that this is the first request for an extension in this case, and Appellant has consented to Respondents' request for a 13 day extension.



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Attorney for Respondent

July 31, 2015  
Columbia, South Carolina

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**PROOF OF SERVICE**

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I certify that I, Leigh Ball, legal assistant to J. Gabriel Coggiola, have properly served **Respondents' Motion for Extension of time to file Respondents' Initial Brief and Designation Of Matter To Be Included In The Record**, by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses on July 31, 2015

Stephen J. Wukela  
Wukela Law Firm  
P.O. Box 13057  
Flornece, South Carolina 29504  
Attorney for Appellant

*B. Leigh Ball*

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July 31, 2015  
Columbia, South Carolina

# WILLSON JONES CARTER & BAXLEY, P.A.

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SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Otis Nero vs. SC Department of Transportation and the State Accident Fund  
WCC File No.: 1222136 DOI: 6/20/2012  
**Appellate Case No.: 2015-001277**

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Motion for Extension of time to file Respondents' Initial Brief and Designation of Matter**, in the above-referenced case. Please note that no filing fee is required due to Respondents' State Accident Fund being a State Agency.

Please have your staff clock in the Motion for Extension of time to file Respondents' Initial Brief and Proof of Service and return the clocked copies.

Thank you for your consideration in this matter. Please contact my office with any questions or if further information is necessary.

Very truly yours,

**Willson Jones Carter & Baxley, P.A.**



John Gabriel Coggiola

JGC/mjl  
Enclosures  
cc: Stephen Wukela, Esquire  
Robin Oxner-King, Adjuster