

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE FULL COMMISSION  
Of the South Carolina Workers' Compensation Commission

T. Scott Beck, Workers' Compensation Commissioner

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WCC File No.: 1211338  
Appellate Case No.: 2015-000693

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Keith Case,

Employee, Appellant,

v.

J. Crawford Logging, Inc.

Employer,

And

Palmetto Timber Fund

Carrier,  
Respondents

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MOTION FOR LATE FILING

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HODGE & LANGLEY LAW FIRM, PC  
Charles J. Hodge  
P.O. Box 2765  
Spartanburg, SC 29304  
(864) 585-3873  
Attorney for the Appellant

Dated: 8/11, 2015  
Spartanburg, South Carolina

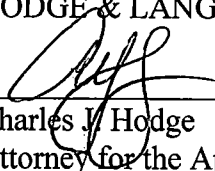
**MEMORANDUM IN SUPPORT OF MOTION FOR LATE FILING**

This Motion is made pursuant to the correspondence received from the Court of Appeals. A Reply Brief was sent by the undersigned on July 29, 2015. The cover letter to the Reply Brief had two erroneous dates. It referenced receipt of an e-mailed copy of the defendants Initial Brief on June 22, 2015, and the hard copy received June 23, 2015. This was error. The copy of the brief was not received through e-mail until July 22, 2015, and the hard copy was received on July 23, 2015.

For the reasons above, Appellate prays that the Court allow submission of his Reply Brief.

Respectfully Submitted by:

HODGE & LANGLEY LAW FIRM, PC



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Charles W. Hodge  
Attorney for the Appellant  
P.O. Box 2765  
Spartanburg, SC 29304  
(864) 585-3873

Dated: 8/11, 2015  
Spartanburg, South Carolina

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**PROOF OF SERVICE OF INITIAL BRIEF**

AUG 13 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

SC Court of Appeals

APPEAL FROM THE FULL COMMISSION OF THE  
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

T. Scott Beck, Workers' Compensation Commissioner

WCC File No.: 1211338

Keith Case, Employee, Appellant,

vs.

J. Crawford Logging, Inc., Employer,

and

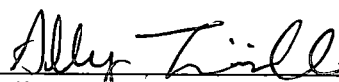
Palmetto Timber Fund, Carrier,  
Respondents

PROOF OF SERVICE

I certify that I have served the Motion for Late Filing on J. Crawford Logging, Inc., by depositing a copy of it in the United States Mail, postage prepaid, on August 11, 2015, addressed to his attorney of record, John W. Rabb, Jr., Post Office Box 1481, Columbia, South Carolina 29202 and the South Carolina Workers' Compensation Commission, PO Box 1715, Columbia, South Carolina 29202.

August 11, 2015

Hodge & Langley Law Firm, PC

  
Ally K. Thrailkill  
Paralegal to Charles J. Hodge  
229 Magnolia Street  
PO Box 2765 (29304)  
Spartanburg, SC 29306  
(864)585-3873  
Attorney for Appellant

**Ally King**

---

**From:** Cindy Harmon <charmon@allenandnewman.com>  
**Sent:** Wednesday, July 22, 2015 9:17 AM  
**To:** Ally King  
**Subject:** Keith Case v. J. Crawford Logging, Inc. - AN 1019-35012  
**Attachments:** Document.pdf; Document.pdf

**RECEIVED**

AUG 13 2015

SC Court of Appeals

FOR CHARLES J. HODGE, ESQUIRE

Please find attached letter to South Carolina Court of Appeal filing Initial Brief and Designation of Matters to be Included on Appeal in the above matter.

Thanks,

--  
Allen & Newman, PLLC  
Cindy Harmon | Legal Secretary  
P.O. Box 1481 | Columbia | SC | 29202-1481  
(803) 714-9606 ext 2203  
F: (803) 714-9607  
Email [charmon@allenandnewman.com](mailto:charmon@allenandnewman.com)

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# HODGE & LANGLEY LAW FIRM, P.C.

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LICENSED IN SOUTH CAROLINA AND GEORGIA

August 11, 2015

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SC Court of Appeals

Ms. Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211


RE: Keith Case v. J. Crawford Logging, Inc.  
Appellate Case No.: 2015-000693  
WCC File No.: 1211338

Dear Ms. Kitchings:

We filed our Reply Brief on July 29, 2015. In the cover letter that accompanied the Reply Brief there were two dates in error. The second paragraph of the letter stated our office did not receive a copy of the Initial Brief of the Respondents until June 22, 2015. This was erroneous. The Brief was not e-mailed to my office until July 22, 2015. Attached is the e-mail which verifies this date. We received the hard copy via US Mail on July 23, 2015. We know this to be true because the defendants did not file the corrected Initial Brief until August 4, 2015.

Out of an abundance of caution, I am filing a Motion per your letter dated August 5, 2015. I am sorry for the confusion.

Yours very truly,

  
Charles J. Hodge  
CJH/abk

Enclosures

cc: Mr. John W. Rabb, Jr  
Via US Mail

SC Workers' Compensation Commission  
For insertion into WCC File No.1211338  
Via US Mail

P.S. Please return a copy of the Motion for Late Filing in the enclosed self-addressed stamped envelope. Thank you!

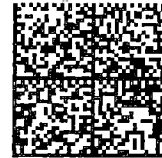
**HODGE & LANGLEY LAW FIRM, P.C.**

*Attorneys at Law*

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P.O. Box 2765

*Spartanburg, South Carolina 29304-2765*



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MAILED FROM ZIP CODE 29306

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**AUG 13 2015**

**SC Court of Appeals**

Ms. Jenny Abbot Kitchings

Clerk of Court

South Carolina Court of Appeals

PO Box 11629

Columbia, SC 29211

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