

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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AUG 24 2015

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

S.C. Supreme Court

Supreme Court Appellate No. 2015-001330

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

George Ferguson, Claimant, Petitioner,

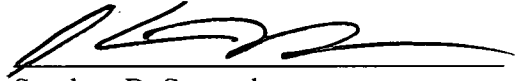
v.

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

**AMENDED MOTION FOR EXTENSION OF TIME TO FILE
PETITIONER'S REPLY TO
RESPONDENTS' RETURN TO PETITION FOR WRIT OF CERTIORARI**

Petitioner, by and through his undersigned attorneys hereby moves this Honorable Court for a 10-day extension in which to file the **Petitioner's Reply to Respondents' Return to Petition for Writ of Certiorari**. The Reply is currently due on August 21, 2015. If the Motion is granted, the due date will be extended to August 31, 2015. As grounds for granting this Motion, Petitioner would show additional time is needed as the undersigned attorney is a sole practitioner, and the Reply necessarily involves briefing several issues new issues raised in Respondent's Return.

Respectfully Submitted



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Columbia, South Carolina
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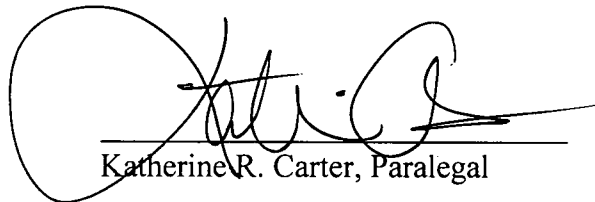
PROOF OF SERVICE

I certify that I am paralegal to Stephen B. Samuels and I have caused a copy of the **Amended Motion for Extension of Time to File Petitioner's Reply to Respondents' Return to Petition for a Writ of Certiorari** to be served by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on **August 24, 2015**, addressed as follows:

Lisa C. Glover, Esquire
Uninsured Employers' Fund Division
State Accident Fund
Post Office Box 210039
Columbia, SC 29221-0039

Christian Stegmaier, Esquire
Ashley R. Kirkman, Esquire
Collins and Lacy, PC
Post Office Box 12487
Columbia, South Carolina 29211

Sean Unterkoefer
United Stand Moving
25 Wing Street
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Katherine R. Carter, Paralegal

August 24, 2015
Columbia, South Carolina



STEPHEN B. SAMUELS
ATTORNEY AT LAW

August 24, 2015

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VIA HAND DELIVERY

Honorable Daniel E. Shearouse
Clerk of Court, S.C. Supreme Court
1231 Gervais Street
Columbia, South Carolina 29201

S.C. Supreme Court

Re: George Ferguson v. New Hampshire Insurance Company, et al.
Supreme Court Appellate No. 2015-001330

Dear Mr. Shearouse:

Enclosed for filing please find the original and seven (7) copies of the Amended Motion for Extension of Time to File Petitioner's Reply to Respondents' Return to Petition for Writ of Certiorari. Also enclosed is the Proof of Service showing service upon the attorney for the Respondents. Please have your staff file the original and copies, and return a clocked copy to my office with my courier.

If you have any questions or concerns, please feel free to call me. Thank you for your assistance in this matter.

With kindest regards, I am

Yours very truly,

Katherine R. Carter
Paralegal to Stephen B. Samuels

/krc

Enclosure(s) as stated

cc: Christian Stegmaier, Esquire
Ashley R. Kirkman, Esquire
Lisa C. Glover, Esquire
Sean Unterkoepler
Natasha M. Hanna, Esquire

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