

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

T. Scott Beck, Workers' Compensation Commissioner

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SEP 30 2015

SC Court of Appeals

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

Keith Case,

Employee, Appellant,

v.

J. Crawford Logging, Inc.

Employer,

And

Palmetto Timber Fund

Carrier,  
Respondents

MOTION FOR LATE FILING

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

Dated: 9/29, 2015  
Spartanburg, South Carolina

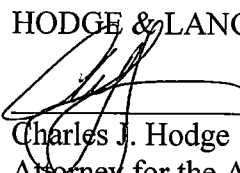
**MEMORANDUM IN SUPPORT OF MOTION FOR LATE FILING**

This Motion is made pursuant to the correspondence received from the Court of Appeals. Plaintiff moves o the Court to permit filing of his Final Reply Brief as there was a misunderstanding interoffice as to when the Final Reply Brief was due.

Defense Counsel has consented to the Motion as the Initial Reply Brief was timely filed. There is no prejudice to either side for the filing of the Final Reply Brief and therefore the Appellant prays that the Court allow late filing.

Respectfully Submitted by:

HODGE & LANGLEY LAW FIRM, PC



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

Dated: 9/29, 2015  
Spartanburg, South Carolina

PROOF OF SERVICE OF MOTION FOR LATE FILING

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The 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 September <sup>29</sup>~~28~~, 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.

September <sup>29</sup>~~28~~, 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

# HODGE & LANGLEY LAW FIRM, P.C.

*Attorneys at Law*

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CHARLES J. HODGE

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NBTA CERTIFIED CIVIL TRIAL SPECIALIST

T. RYAN LANGLEY

E-MAIL: RLangley@hodgelawfirm.com

LICENSED IN SOUTH CAROLINA AND GEORGIA

September 29, 2015

Mr. John W. Rabb  
Attorney at Law  
Post Office Box 1481  
Columbia, SC 29202


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

Dear John:

Thank you for speaking with me on September 29, 2015. You have graciously agreed to consent to our late filing of the Final Reply Brief. As you know we timely filed the Final Brief as well as the initial Reply Brief but unfortunately there was a mistake made interoffice and the Final Reply Brief was not filed timely.

I appreciate your consideration and look forward to seeing you soon.

Yours very truly,

  
Charles J. Hodge  
CJH/abk

Enclosures

cc: Ms. Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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

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SEP 30 2015

SC Court of Appeals

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T. RYAN LANGLEY

E-MAIL: RLangley@hodgelawfirm.com

LICENSED IN SOUTH CAROLINA AND GEORGIA

September 28, 2015

Ms. Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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

**RECEIVED**

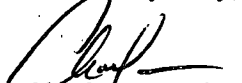
SEP 30 2015

SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed the unbound original and 15 bound copies of the *Final Reply Brief of the Appellant* and *Motion for Late Filing* for the above referenced case. By first class mail copies of these documents are being served on Mr. John W. Rabb, Jr., Attorney for Defendants, and the South Carolina Workers' Compensation Commission at the address set forth in the enclosed Proof of Service by Mail

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

Express® **US Airbill** Tracking Number **8064 4667 5578**

Form ID No. **0200**

Recipient's Copy

From **[Redacted]**  
 Date **9/29/15**  
 Sender's Name **Charles Hodge** Phone **864 588 3177**  
 Company **Hodge + Langley Law Firm**  
 Address **229 Magnolia Street** Dept./Floor/Suite/Room  
 City **Spartanburg** State **SC** ZIP **29206**  
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**FedEx Standard Overnight**  
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**FedEx 2Day**  
Second business afternoon.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

**FedEx Express Saver**  
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**SEP 30 2015**  
**SC Court of Appeals**

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