

77537

RECEIVED  
OCT 18 2015  
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No.: 2015-001336

Jose Juan Jimenez, Employee, ..... Appellant

v.

Kohler Company, Self-Insured Employer, ..... Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S BRIEF  
AND DESIGNATION OF MATTER ON APPEAL**

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Respondent Kohler Company moves this Court for an order granting an extension of time for Respondent to serve and file Respondent's Initial Brief and Designation of Matter in the above-captioned action. Currently Respondent's Initial Brief and Designation of Matter are due on or about Wednesday, October 16, 2015. The undersigned Respondent requests an extension of time of thirty (30) days to file/serve Initial Brief and Designation of Matter, as it needs additional time to respond to the arguments raised by the Appellant

and due to other deadlines and work obligations. The new deadline for Respondent's Initial Brief and Designation of Matter will be November 15, 2015.

Additionally, the undersigned Respondent requests that all filing/service deadlines be held in abeyance pending the Court's ruling on this motion.

Counsel for the Respondent Kohler Company has consulted with counsel for the Appellant who graciously consents to this extension.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By: 

Grady L. Beard

Bar #10190

Nicolas L Haigler

Bar #76684

Robert E. Horner

Bar #16326

Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

Attorneys for Respondent Kohler Company

October 13, 2015

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED  
OCT 13 2015  
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

Appellate Case No.: 2015-001336

Jose Juan Jimenez, Employee, ..... Appellant

v.

Kohler Company, Self-Insured Employer, ..... Respondent.

**PROOF OF SERVICE**

I certify that I have served a copy of the Motion for Extension of Time to File Respondent's Brief and Designation of Matter on Appeal, on the following: Alton L. Martin, Jr., Esquire, Martin & Martin, P.A., Post Office Box 8220, Greenville, SC 29604 (via regular U.S. Mail) and Ms. Amy Bracy, Judicial Director, South Carolina Workers' Compensation Commission, 1333 Main Street, Suite 500, Columbia, SC 29201 (via hand-delivery) on October 13, 2015.

Racheal M. Dykes  
Racheal M. Dykes, Legal Assistant  
Sowell Gray Stepp & Laffitte, LLC  
1310 Gadsden Street  
Post Office Box 11449  
Columbia, South Carolina 29211  
(803) 929-1400  
Attorney for Respondent

Columbia, South Carolina  
October 13, 2015

**RECEIVED**  
OCT 13 2015  
SC Court of Appeals

October 13, 2015

**VIA HAND-DELIVERY**

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

RE: Jose Juan Jimenez, Employee, Appellant v. Kohler Company, Self-Insured Employer,  
Respondent  
Appellate Case No.: 2015-001336  
WCC File No.: 1219561  
Date of Accident: 03/13/12  
Claim No.: 186492343-001  
Our File No.: 6457/8006

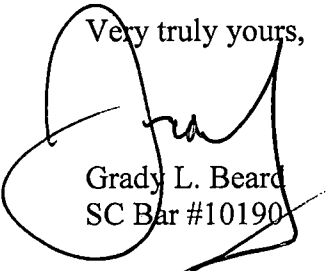
Dear Ms. Kitchings:

Enclosed herewith are an original and one (1) copy of the Motion for Extension of Time to File Respondent's Brief and Designation of Matter on Appeal in the above-referenced matter. We would appreciate your filing the original and returning a clocked-in copy of same to us via our courier. We are enclosing our Firm's check for the \$25.00 filing fee.

By copy of this letter and aforementioned documents to opposing counsel and the South Carolina Workers' Compensation Commission, we are serving them with a copy of the Motion for Extension of Time to File Respondent's Brief and Designation of Matter on Appeal.

With kindest personal regards, I remain

Very truly yours,

  
Grady L. Beard  
SC Bar #10190

GLB:rmd  
Enclosures

cc: Alton L. Martin, Jr., Esquire (w/enclosures)  
Ms. Amy Bracy, Judicial Director, SCWCC (via hand-delivery) (w/enclosures)  
Ms. Kim Stringer (via e-mail only) (w/enclosures)  
Mr. Mike Tolleson (via e-mail only) (w/enclosures)

Mr. Dean Yagodinski (via e-mail only) (w/enclosures)

Mr. Sid DeVaul (via e-mail only) (w/enclosures)

Ms. Dawn Moore (via e-mail only) (w/enclosures)

John Gerard Pawley, Esq (via e-mail only) (w/enclosures)

[Broadspire.claims-NewOrleans@xerox.com](mailto:Broadspire.claims-NewOrleans@xerox.com) (w/enclosures)