

7/10/15

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2015-000692

RECEIVED
OCT 26 2015
SC Court of Appeals

Kimberly Walker, Claimant, Appellant,

v.

Sunbelt Human Advancement, Employer, and
State Accident Fund, Carrier, Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL REPLY BRIEF**

Appellant, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Reply Brief. The Brief is currently due on October 26, 2015. If the extension is granted, the Brief will be due on November 25, 2015. As grounds for granting this Motion, Appellant would show additional time is needed because the undersigned is a solo practitioner and due to new issues raised in Respondents' Brief, this particular brief requires additional research and writing. Additionally, Appellant would further show that the Respondents' Brief was mailed and not received until October 20, 2015.

Respectfully Submitted:



Stephen B. Samuels
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29250
(803) 779-4000

Alton L. Martin, Jr.
MARTIN & MARTIN, PA
1415 Augusta Street
Greenville SC 29605

October 26, 2015
Columbia, South Carolina

Attorneys for Appellant

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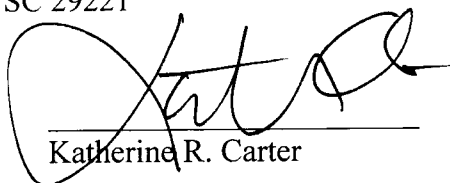
Sunbelt Human Advancement, Employer, and
State Accident Fund, Carrier, Respondents.

PROOF OF SERVICE

I certify that I, Katherine R. Carter, am a paralegal to Stephen B. Samuels and I have served the **Motion for Extension of Time to File Appellant's Initial Reply Brief** upon counsel for the Respondents by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed as follows:

L. Brenn Watson, Esquire
Willson Jones Carter & Baxley
872 S. Pleasantburg Drive
Greenville, SC 29607

Page P. Snyder, Esquire
State Accident Fund
PO Box 102100
Columbia SC 29221


Katherine R. Carter

October 26, 2015
Columbia, South Carolina



STEPHEN B. SAMUELS
ATTORNEY AT LAW

October 26, 2015

Via Hand Delivery

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

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SC Court of Appeals

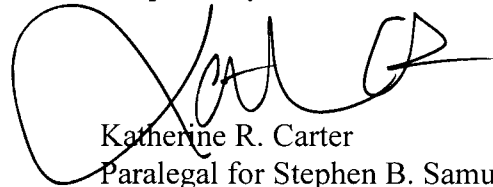
RE: Kimberly Walker v. Sunbelt Human Advancement, et. al.
Appellate Case No.: 2015-000692

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Motion for Extension of time to file Appellant's Initial Reply Brief and Proof of Service**, in the above case.

Please have your staff clock in the Motion for Extension of Time to file Appellant's Initial Reply Brief and Proof of Service and return the clocked copies in the enclosed self-addressed stamped envelope.

Respectfully,



Katherine R. Carter
Paralegal for Stephen B. Samuels

SBS/krc
Enclosure(s) as stated

cc: Alton L. Martin, Jr., Esquire
L. Brenn Watson, Esquire
Page P. Snyder, Esquire

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