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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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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.

**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, November 18, 2015. The undersigned Respondent requests an extension of time of thirty (30) days to file/serve its 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 December 18, 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
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Columbia, South Carolina 29211
(803) 929-1400

Attorneys for Respondent Kohler Company

November 12, 2015

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IN THE COURT OF APPEALS

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WORKERS' COMPENSATION COMMISSION

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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 November 12, 2015.

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

Columbia, South Carolina
November 12, 2015

November 12, 2015

VIA HAND-DELIVERY

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

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SC Court of Appeals

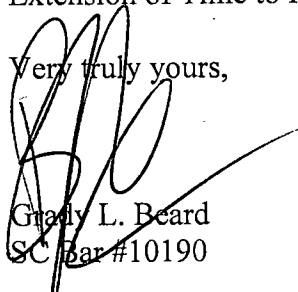
RE: Jose Juan Jimenez, Employee, Appellant v. Kohler Company, Self-Insured Employer,
Respondent
Appellate Case No.: 2015-001336
WCC File No.: 1219561
Date of Accident: 03/13/12
Claim No.: 186492343-001
Our File No.: 6457/8006

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.

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)



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