

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2016-000325

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APR 04 2016

Appellant,
SC Court of Appeals

Pedro A. Moran, Employee/Claimant,

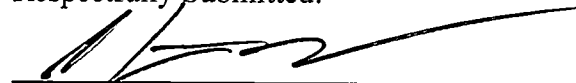
v.

JMR Siding, LLC, Employer, and
Hartford Underwriters Insurance Company, Carrier, Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

Appellant, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Brief of Appellant and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on April 2, 2016. If the extension is granted, the Brief will be due on May 2, 2016. As grounds for this Motion, Appellant would show additional time is needed as counsel for Appellant will be traveling out of the country April 20 - May 3, 2016.

Respectfully Submitted:



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

Mark R. Calhoun
CALHOUN LAW FIRM
714 East Main Street
Lexington, SC 29072
(803) 957-8401

April 1, 2016
Columbia, South Carolina

Counsel for the Appellant

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v.

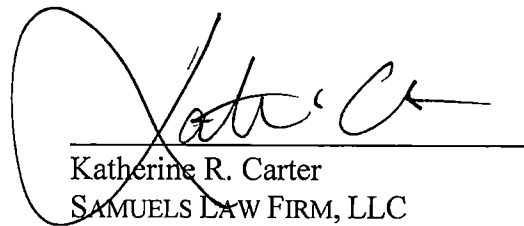
JMR Siding, LLC, Employer, and
Hartford Underwriters Insurance Company, Carrier, Respondents.

PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal to Stephen B. Samuels, have served the **Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter** upon counsel for the Respondents and the South Carolina Workers' Compensation Commission by depositing a copy of it in the United States Mail, postage prepaid, on April 1, 2016, addressed as follows:

Sarah S. Alphin, Esquire
Willson, Jones, Carter & Baxley, PA
4500 Fort Jackson Blvd.
Columbia, SC 29209

April 1, 2016



Katherine R. Carter
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000



STEPHEN B. SAMUELS
ANDREW J. BROWN
ATTORNEYS AT LAW

April 1, 2016

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Pedro A. Moran v. JMR Siding, LLC, et. al.
Appellate Care No.: 2016-000325

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 Brief and Designation of Matter and Proof of Service**, in the above case.

Please have your staff file the Motion for Extension of Time to file Appellant's Initial Brief, Designation of Matter and Proof of Service and return a clocked copy in the enclosed self-addressed stamped envelope.

Respectfully,

Katherine R. Carter
Paralegal for Stephen B. Samuels

/krc
Enclosure(s) as stated

cc: Mark Calhoun, Esquire
Sarah S. Alphin, Esquire

WE WORK FOR THE PEOPLE WHO WORK.

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SC Court of Appeals

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



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