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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2014-002354

RECEIVED
APR 27 2016
SC Court of Appeals

Hector G. Fragosa, Employee/Claimant, Appellant,

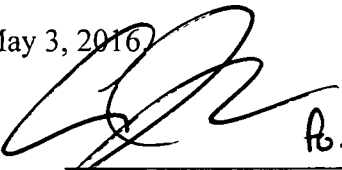
v.

Kade Construction, LLC, Employer, and
Key Risk Insurance Company of SC, Carrier, Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S REPLY TO RESPONDENTS' RETURN TO PETITION
FOR REHEARING AND PETITION FOR REHEARING EN BANC**

Appellant, by and through his undersigned attorney, hereby moves before this Honorable Court for a 7-day extension in which to file the Appellant's Reply to Respondents' Return. The Reply is currently due on May 1, 2016. If the extension is granted, the Reply will be due on May 8, 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.

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For Stephen Samuels...

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Attorneys for Appellant

Columbia, South Carolina
April 27, 2016

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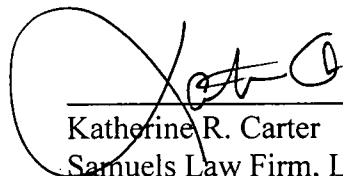
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PROOF OF SERVICE

I certify that I, Katherine Carter, am a paralegal for the Samuels Law Firm, LLC and I have caused the **Motion for Extension** to be served 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 April 27, 2016, addressed as follows:

Michael W. Burkett, Esquire
J. Gabriel Coggiola, Esquire
Willson Jones Carter & Baxley, P.A.
4500 Fort Jackson Boulevard
Columbia, South Carolina 29209



Katherine R. Carter
Samuels Law Firm, LLC
1320 Richland Street
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April 27, 2016



STEPHEN B. SAMUELS
ANDREW J. BROWN
ATTORNEYS AT LAW

April 27, 2016

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SC Court of Appeals

Via Hand Delivery

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

RE: Hector G. Fragosa v. Kade Construction, LLC
Appellate Case No.: 2014-002354

Dear Ms. Kitchings:

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

Please have your staff clock in the Motion for Extension of Time to file Appellant's Reply to Respondents' Return and Proof of Service and return the clocked copies with my courier.

Thank you for your consideration in this matter. Please contact us with any questions or if further information is needed from our office.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine R. Carter".

Katherine R. Carter
Litigation Paralegal

/krc

Enclosure(s) as stated

cc: Michael Burkett, Esq.
J. Gabriel Coggiola, Esq.
Jeff Chandler, Esq.

WE WORK FOR THE PEOPLE WHO WORK.

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