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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 22 2016  
SC Court of Appeals

Pedro A. Moran, Employee/Claimant, ..... Appellant,

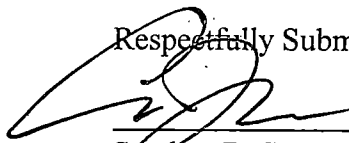
v.

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

**SECOND 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 May 4, 2016. If the extension is granted, the Brief will be due on June 3, 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:

 for Stephen B. Samuels

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

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

April 21, 2016  
Columbia, South Carolina

Counsel for the Appellant

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
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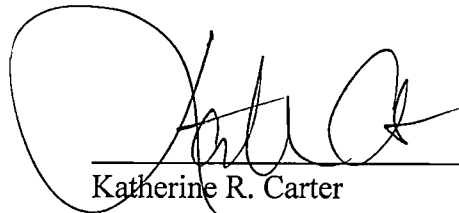
**PROOF OF SERVICE**

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I certify that I, Katherine R. Carter, paralegal to Stephen B. Samuels, have served the **Second 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 21, 2016, addressed as follows:

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

April 21, 2016



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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

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APR 22 2016

SC Court of Appeals

April 21, 2016

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

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 **Second 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 Second 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

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APR 22 2016

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