

79394

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

WCC NO. 1320600

**RECEIVED**

APR 27 2016

**SC Court of Appeals**  
Appellant

Kevin M. Todd ..... Appellant

vs.

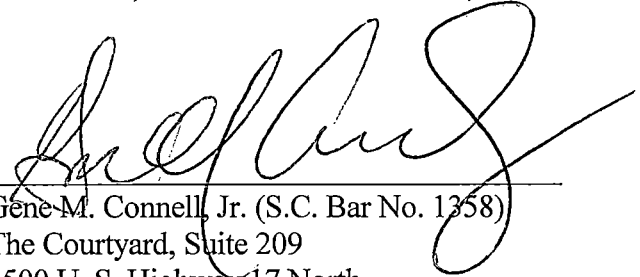
Michael Roberts d/b/a Michael Roberts Home Repair  
and S.C. Uninsured Employers' Fund ..... Respondents

MOTION TO EXTEND TIME TO FILE APPELLANT'S  
INITIAL BRIEF AND DESIGNATION OF MATTER

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellant, moves this Court for an Order extending the time to file Appellant's Initial Brief and Designation of Matter currently due April 27, 2016 in the captioned case. The basis of this Motion is counsel's trial schedule.

WHEREFORE, Appellant's counsel respectfully requests this Court issue its Order granting Appellant an additional thirty (30) days to file Appellants' Initial Brief and Designation of Matter, thus extending the time until May 26, 2016.

KELAHER, CONNELL & CONNOR, P.A.



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Gene M. Connell, Jr. (S.C. Bar No. 1358)  
The Courtyard, Suite 209  
1500 U. S. Highway 17 North  
Post Office Drawer 14547  
Surfside Beach, South Carolina 29587-4547  
(843) 238-5648 (phone)  
(843) 238-5050 (facsimile)  
[gconnell@classactlaw.net](mailto:gconnell@classactlaw.net)  
**Attorney for Appellant**

April 25, 2016  
Surfside Beach, South Carolina

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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WCC NO. 1320600

Kevin M. Todd ..... Appellant

vs.

Michael Roberts d/b/a Michael Roberts Home Repair  
and S.C. Uninsured Employers' Fund ..... Respondents


PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served on the 25 day of April, 2016, a **Motion to Extend Time to File Appellant's Initial Brief and Designation of Matter** on the Respondents and on the South Carolina Workers' Compensation Commission, by depositing a copy of same in the United States Mail, postage prepaid, to:

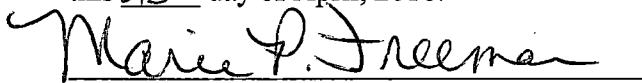
Lisa C. Glover, Esquire  
South Carolina Uninsured Employers' Fund  
Post Office Box 210039  
Columbia, SC 29221

Amy Bracy  
Judicial Director  
S. C. Workers' Compensation Commission  
Post Office Box 1715  
Columbia, SC 29202-1715

Mike Roberts  
d/b/a Mike Roberts Home Repair  
3334 New Road  
Conway, SC 29527

  
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,  
this 25 day of April, 2016.

  
Notary Public for South Carolina  
My Commission Expires: 6/11/24

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER\*  
GENE M. CONNELL, JR.  
L. SIDNEY CONNOR, IV  
LISA POE DAVIS

\* OF COUNSEL

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238-5648  
FAX: 238-5050

RECEIVED

April 25, 2016

APR 27 2016

SC Court of Appeals

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

Re: *Kevin M. Todd v. Michael Roberts d/b/a Michael Roberts Home Repair and  
S.C. Uninsured Employers' Fund*  
W.C.C. File No. 1320600  
Our File No. 2014-0046C

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion to Extend Time to File Appellant's Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,

  
Gene M. Connell, Jr.

GMC,Jr.:sm  
Enclosures  
cc w/enc.:

Lisa C. Glover, Esquire  
Amy Bracy, Judicial Director, S. C. Workers' Compensation Commission  
Mike Roberts d/b/a Mike Roberts Home Repair

