

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

WCC File No. 0717624

RECEIVED
SEP 27 2012
SC Court of Appeals

Hector G. Fragosa, Employee/Claimant, Appellant,

v.

Kade Construction, LLC, Employer, and Key Risk Management Services, Inc., 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 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 September 28, 2012. If the extension is granted, the Brief will be due on October 29, 2012. As grounds for this Motion, Appellant would show additional time is needed as Counsel has multiple matters pending before this Court many of which require the filing of briefs.

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Attorneys for Appellant

Columbia, South Carolina
September 27, 2012

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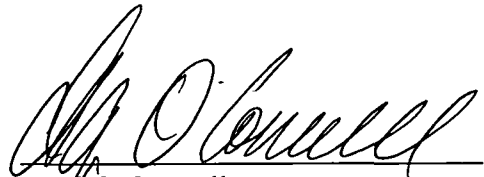
Hector G. Fragosa, Employee/Claimant, Appellant,

v.

Kade Construction, LLC, Employer, and Key Risk Management Services, Inc., Carrier,
..... Respondents.

PROOF OF SERVICE

I certify that I am the paralegal to Stephen B. Samuels and I have served the **Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter** upon 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 the date indicated below, addressed to their attorney of record, Michael W. Burkett, Esquire, Willson Jones Carter & Baxley, 4500 Fort Jackson Blvd., Columbia, SC 29209.



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September 27, 2012

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 and Key Risk
Management Services, Inc.
WCC File No.: 0717624

Dear Ms. Kitchings:

Enclosed for filing please find the original and six (6) copies of **Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter** in the above-referenced appeal. I have also enclosed our firm's check in the amount of Twenty-Five (\$25.00) Dollars as payment of the required filing fee.

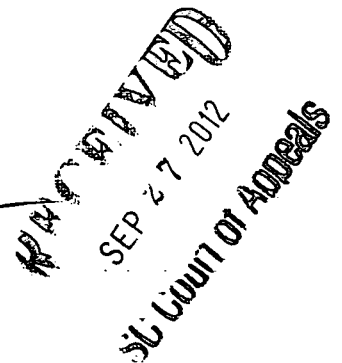
By copy of this letter and enclosure to Michael Burkett, counsel of record for the Respondents, we are serving a copy of our **Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter** upon him as indicated by the attached Proof of Service.

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

With kindest regards, I am

Yours very truly,

Stephen B. Samuels



SBS/aro

Enclosures

cc w/encl.: Michael W. Burkett, Esquire
Jeffrey C. Chandler, Esquire