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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

JUN 22 2016

SC Court of Appeals

Appellate Case No.: 2016-000617

Elias Reyna, Respondent,

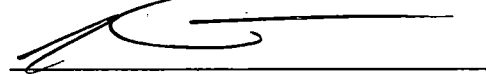
v.

Fenerly Inc. / Tony's Place of Sumter LLC, Employer, and
Foremost Signature Insurance Co., Carrier, Appellants.

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

Respondent, 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 Respondent and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on June 24, 2016. If the extension is granted, the Brief will be due on July 24, 2016. As grounds for this Motion, Respondent would show additional time is needed as counsel for the Respondent is newly retained and needs additional time to adequately prepare the brief.

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

June 20, 2016
Columbia, South Carolina

Counsel for the Respondent

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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v.

Fenerly Inc. / Tony's Place of Sumter LLC, Employer, and
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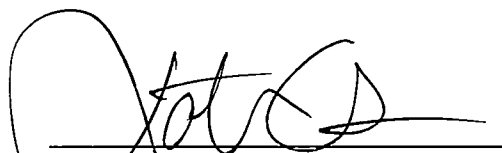
PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter** upon counsel for the Appellants by depositing a copy of it in the United States Mail, postage prepaid, on June 20, 2016, addressed as follows:

Brett H. Bayne, Esq.
McAngus Goudelock & Courie, LLC
1320 Main Street
Meridian, 10th Floor
Columbia, SC 29201

William Harbison, Esq.
Laura W. Jordan, Esq.
Gallivan White & Boyd, PA
PO Box 7368
Columbia, SC 29202

June 20, 2016


Katherine R. Carter
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(803) 779-4000



STEPHEN B. SAMUELS
ANDREW J. BROWN
ATTORNEYS AT LAW

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SC Court of Appeals

June 20, 2016

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

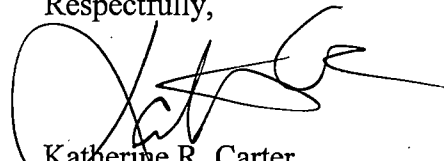
RE: Elias Reyna v. Fenerly Inc. / Tony's Place of Sumter LLC, et al.
Appellate Case No.: 2016-000617

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Motion for Extension of time to file Respondent'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 Respondent'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
Litigation Paralegal

/krc

Enclosure(s) as stated

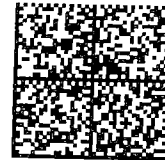
cc: Mark Calhoun, Esq.
Brett H. Bayne, Esq.
William Harbison, Esq.
Laura W. Jordan, Esq.


WE WORK FOR THE PEOPLE WHO WORK.

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