



STEPHEN B. SAMUELS
ANDREW J. BROWN
ATTORNEYS AT LAW

July 14, 2016

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JUL 15 2016

SC Court of Appeals

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 **Motion for Extension of time to file Appellant's Initial Reply Brief and Proof of Service**, in the above case.

Please have your staff file the Motion for Extension of Time to file Appellant's Initial Reply Brief 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

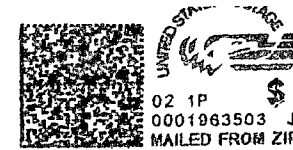
/krc

Enclosure(s) as stated

cc: Mark Calhoun, Esquire
Sarah S. Alphin, Esquire

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1320 RICHLAND STREET
COLUMBIA, SC 29201

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

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2016-000325

Pedro A. Moran, Employee/Claimant, Appellant,

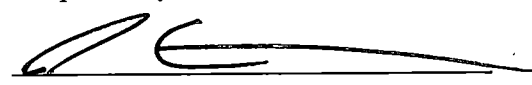
v.

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

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL REPLY BRIEF**

Appellant, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Rely Brief of Appellant. The Brief is currently due on July 16, 2016. If the extension is granted, the Brief will be due on August 15, 2016. 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 and was traveling out of the country July 1 - July 8, 2016.

Respectfully Submitted:



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Lexington, SC 29072
(803) 957-8401

July 14, 2016
Columbia, South Carolina

Counsel for the Appellant

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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JUL 15 2016
SC Court of Appeals

Pedro A. Moran, Employee/Claimant, Appellant,

v.

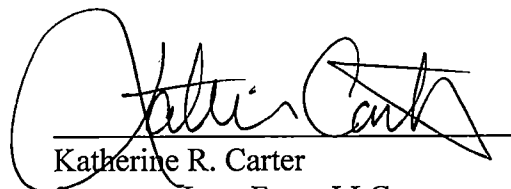
JMR Siding, LLC, Employer, and
Hartford Underwriters Insurance Company, Carrier, Respondents.

PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal to Stephen B. Samuels, have served the **Motion for Extension of Time to File Appellant's Initial Reply Brief** 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 July 14, 2016, addressed as follows:

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

July 14, 2016



Katherine R. Carter
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