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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

APPEAL FROM RICHLAND COUNTY  
Workers Compensation Commission

JUL 19 2016  
SC Court of Appeals

APPELLATE CASE NO. 2016-000509  
WCC FILE NO. 1212974

SUSIE HENLEY, EMPLOYEE.....APPELLANT,

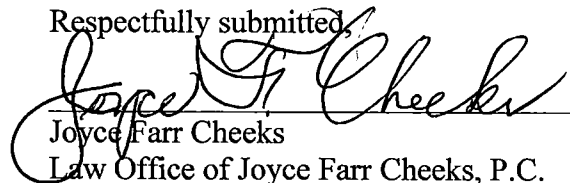
V.

OTIS SPUNKMEYER, EMPLOYER, and  
TRUMBULL INSURANCE COMPANY c/o  
THE HARTFORD, CARRIER.....RESPONDENTS.

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

Now comes Appellant David Henley, by and through his undersigned counsel, and moves before this Honorable Court for an Order granting a ten (10) day extension of time until July 29, 2016, to file and serve Appellant's Initial Reply Brief. Counsel makes this motion on the ground that counsel is a solo practitioner and numerous pending professional obligations and other time constraints imposed upon counsel by previously scheduled matters preclude said counsel's ability to timely and adequately address the issues within the ten (10) day period of time allowed by the Appellate Court Rules. Respondents Jeannette Padgett, Joel Padgett and Maurice Padgett served their initial brief on Saturday, July 9, 2016, making the Reply Brief currently due by July 19, 2016. Counsel received Respondents' Initial Brief on Monday, July 11, 2016, effectively allowing only eight (8) days to file and serve Appellant's Initial Reply Brief.

Respectfully submitted,



Joyce Farr Cheeks

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(803) 256-3352 office

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**Attorney for Appellant**

Columbia, S.C.

July 19, 2016

Other Counsel of Record:

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**Attorney for potential dependents Jeannette Padgett,  
Joel Padgett, and Maurice Padgett,**

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735 Johnnie Dodds Boulevard, Suite 200  
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**Attorney for Respondent Employer, Carrier**

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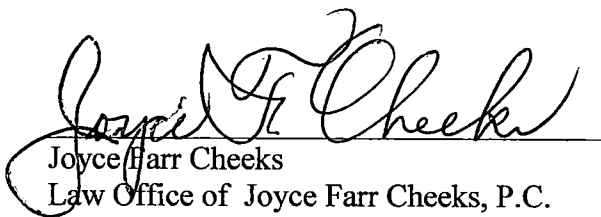
OTIS SPUNKMEYER, EMPLOYER, and  
TRUMBULL INSURANCE COMPANY c/o  
THE HARTFORD, CARRIER.....RESPONDENTS.

**CERTIFICATE OF SERVICE**

I certify that I have served the Motion for Extension of Time to File Appellant's Initial Reply Brief on the following by depositing a copy in the United States Mail, postage prepaid, on July 19, 2016, and addressed to the attorneys of record, as follows:

R. Jamison Tinsley, Esquire  
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July 19, 2016

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July 19, 2016

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

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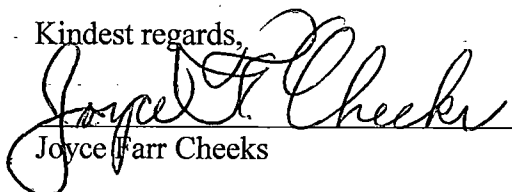
SC Court of Appeals

**RE: Susie Henley v. Otis Spunkmeyer and Trumbull Insurance Company**  
**Case No. 2016-000509**  
**WCC File No. 1212974**

Dear Ms. Kitchings:

Please find enclosed for filing, the original and nine (9) copies of Appellant's Motion for Extension of Time to File Initial Reply Brief, the Certificate of Service of same, and a check for \$25.00 for filing fees. Please stamp and return to our courier the extra copies of the motion as proof of filing. By copy of this letter we are serving the motion on counsel for all parties of record in this appeal.

Kindest regards,

  
Joyce Farr Cheeks

/jfc

Enclosures

cc: R. Jamison Tinsley, Esquire  
Helen F. Hiser, Esquire