

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM
THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION
Full Commission Review

RECEIVED
JUL 25 2016
SC Court of Appeals

Case No. 1320141

Ignacio Rodriguez,.....Respondent

-vs-

Robert T. Pierson d/b/a Pierson Construction Co.,

and

ABC Care, Inc.,

and

Property and Casualty Insurance Co. of Hartford,

and

The South Carolina Workers' Compensation Uninsured Employers Fund

Of whom Property and Casualty Insurance Co. of Hartford is the..... Appellant.

MOTION FOR ENLARGEMENT OF TIME TO RESPOND

Counsel for the Respondent, Ignacio Rodriguez, hereby moves for an enlargement of time to respond to the Appellant's Motion for Leave to Present Additional Evidence. Counsel respectfully requests an additional ten (10) days to respond or plead otherwise to Appellant's Motion. Counsel is currently involved in two (2) death penalty cases, Freddie Eugene Owens v Bryan P. Sterling, Commissioner, South Carolina Department of Corrections, Joseph

McFadden, Warden Lieber Correctional Institution, C.A. 0:16-cv-02512, and Charles Christopher Williams vs Bryan P. Sterling, Commissioner, South Carolina Department of Corrections, Joseph McFadden, Warden Lieber Correctional Institution, C.A. 6:16-cv-01655

and will require the additional time to respond to the Motion.



WILLIAM H. EHLIES II
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July 22, 2016

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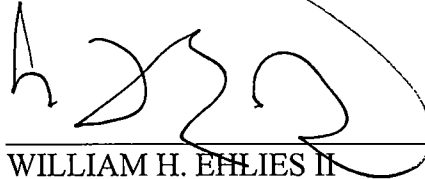
PROOF OF SERVICE

The undersigned hereby certifies that a true copy of Respondent's Motion for
Enlargement of Time has been served on the all parties of record by mailing in the United States
mail, postage prepaid on this 22 day of July, 2016, addressed as follows:

David M. Padgett
Holder Padgett Littlejohn & Prickett
1204 A. East Washington Street
Greenville, South Carolina 29601

Randall Hiller
Attorney at Law
850-B Wade Hampton Blvd.
Greenville, South Carolina 29609

David H. Keller
Turner Padgett Graham and Laney
Post Office Box 1509
Greenville South Carolina 29602

A handwritten signature in black ink, appearing to read "W. Ehli II", is written over a horizontal line. The signature is stylized and somewhat cursive.

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July 22, 2016

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FACSIMILE NUMBER 864-232-4854
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July 22, 2016

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JUL 25 2016

SC Court of Appeals

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

Re: Ignacio Rodriguez v Robert T. Pierson d/b/a Pierson Construction Co.,
and ABC Care, Inc. and Property and Casualty Insurance Co. of Hartford,
and the South Carolina Workers' Compensation Uninsured Employers'
Fund
Case No. 1320141

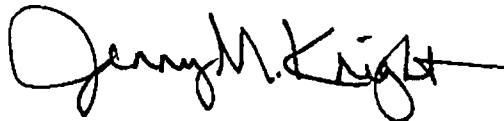
Dear Ms. Kitchings:

Enclosed please find and original and six (6) copies of Respondent's Motion for
Enlargement of Time for the above matter together with our \$25.00 filing fee. By copy
of this letter, we are providing our Motion to all parties and have included our Proof of
Service.

If you require anything further, please do not hesitate to contact this office.

Sincerely yours,

WILLIAM H. EHLIES, P.A.

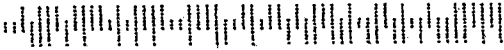


Jenny M. Knight
Legal Assistant
Email: jenny@ehlieslaw.com

/jmk

enclosures

cc: David M. Padgett, Attorney at Law
Randall Hiller, Attorney at Law
David H. Keller, Attorney at Law

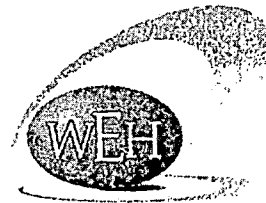


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Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
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