

80376

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED  
JUL 25 2016  
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

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.

**SECOND 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 July 25, 2016. If the extension is granted, the Brief will be due on August 24, 2016. As grounds for this Motion, Respondent would show additional time is needed as Counsel has multiple matters pending before this Court many of which require the filing of briefs and additional time is needed to adequately prepare this 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

July 25, 2016  
Columbia, South Carolina

Counsel for the Respondent

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

RECEIVED

JUL 25 2016

SC Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

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.

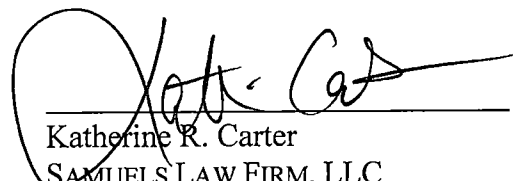
PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **Second 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 July 25, 2016, addressed as follows:

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

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

July 25, 2016



Katherine R. Carter  
SAMUELS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000



STEPHEN B. SAMUELS  
ANDREW J. BROWN  
ATTORNEYS AT LAW

July 25, 2016

RECEIVED  
JUL 25 2016  
SC Court of Appeals

*Via Hand Delivery*

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

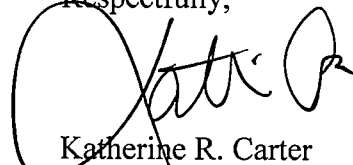
RE: Elias Reyna v. Fenerly Inc. / Tony's Place of Sumter LLC, et al.  
Appellate Case No.: 2016-000617

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Second 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 Second Motion for Extension of Time to file Respondent's Initial Brief, Designation of Matter and Proof of Service and return a clocked copy to our courier.

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.

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSLAWFIRM.NET