

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

AUG 04 2016

SC Court of Appeals

Appellate Case No.: 2016-001180

Kim E. Argo, Claimant, Appellant,

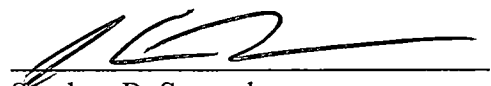
v.

Flexible Technologies, Inc., Employer, and
Liberty Insurance Corporation, Carrier, Respondents.

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

Appellant, 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 Appellant and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on August 4, 2016. If the extension is granted, the Brief will be due on September 3, 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 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

August 3, 2016
Columbia, South Carolina

Counsel for the Appellant

THE STATE OF SOUTH CAROLINA
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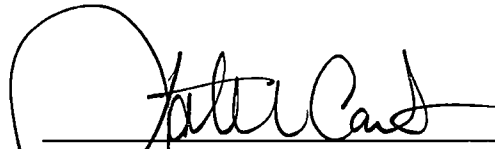
Flexible Technologies, Inc., Employer, and
Liberty Insurance Corporation, Carrier, Respondents.

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 Appellant's Initial Brief and Designation of Matter** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on August 3, 2016, addressed as follows:

L. Brenn Watson, Esq
Willson Jones Carter & Baxley, PA
872 S. Pleasantburg, Dr
Greenville, SC 29607

August 3, 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

August 3, 2016

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SC Court of Appeals

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

RE: Kim E. Argo v. Flexible Technologies, Inc. and Liberty Insurance Corporation
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 Appellant'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 Appellant'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
Paralegal for Stephen B. Samuels

/krc
Enclosure(s) as stated

cc: L. Brenn Watson, Esq.

WE WORK FOR THE PEOPLE WHO WORK.



1320 RICHLAND STREET
COLUMBIA, SC 29201

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SC Court of Appeals

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1015 Sumter Street
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