

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from the South Carolina
Workers Compensation Commission

Susan S. Barden, Avery B. Wilkerson, Jr., and
R. Michael Campbell, II Commissioners

Appellate Case No. 2016-000507

RECEIVED
AUG 12 2016
SC Court of Appeals

Jack Woodward, Claimant,

Appellant,

v.

ArcellorMittal Georgetown, Inc., Employer, and
New Hampshire Insurance Company, Carrier,

Respondents.

**SECOND MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF RESPONDENT**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown
F. Drake Rogers
Catherine H. Chase
25 Calhoun Street, Suite 400 (29401)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for ArcellorMittal Georgetown, Inc.

✓

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW the Respondent ArcelorMittal Georgetown, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves this Honorable Court for a second extension of thirty (30) days' time to serve and file its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed July 13, 2016, the deadline for Respondent's initial brief and designation of matter is August 10, 2016. In light of other time commitments, the undersigned respectfully requests that Respondent's deadline for serving/filing its initial brief and corresponding designation of matter to be included in the record on appeal be extended by 30 days from August 10, 2016, i.e., through September 9, 2016. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant. The undersigned has consulted with Raymond C. Fischer, Esquire, counsel for Appellant, who has no opposition to this request.

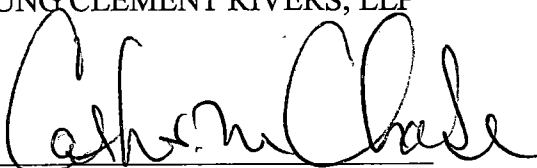
The undersigned also has an initial brief due to this Court in the matter of Rodney Ward, Appellant, v. ArcelorMittal Georgetown, Inc., Employer, and New Hampshire Insurance Company, Carrier, Respondents, (Appellate Case No. 2016-000510) on August 10, 2016. Due to another other time commitments and briefings, the undersigned will be requesting an extension of time in the Ward appeal as well. So that the undersigned has adequate time to address the matters in both this appeal and the Ward appeal, she respectfully requests that if the Court grants this extension of time, that it not add the limitation that a third extension of time not be allowed. While the undersigned will attempt to complete both briefs by September 9, 2016, she understands this is a large undertaking. She also believes that the counsel for Appellant, which is the same in both this appeal and the Ward appeal, would not be prejudiced by having their reply

briefs spaced out. The undersigned plans to work on the Ward appeal first as this initial brief was submitted first.

WHEREFORE, Respondent respectfully requests that this Honorable Court grant an additional extension of 30 days' time to serve and file the Initial Brief of Respondent and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for service/filing of Respondent's initial brief and designation of matter would be September 9, 2016, according to the undersigned's calculations, and that the Court not limit this extension of time to being the last available for this brief. Further, Respondent respectfully requests that the Court hold Respondent's present deadline for briefing/designation of matter in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

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Attorneys for ArcelorMittal Georgetown, Inc.

Charleston, South Carolina

Dated: August 10, 2016

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IN THE COURT OF APPEALS**

Appeal from the South Carolina
Workers Compensation Commission

Susan S. Barden, Avery B. Wilkerson, Jr., and
R. Michael Campbell, II Commissioners

Appellate Case No. 2016-000507

Jack Woodward, Claimant,

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v.

ArcelorMittal Georgetown, Inc., Employer, and
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Respondents.

PROOF OF SERVICE

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SC Court of Appeals

I, Catherine H. Chase, of Young Clement Rivers, LLP, counsel for Respondent ArcelorMittal Georgetown, Inc., do hereby certify that I have served the Second Motion for Extension of Time to File/Serve Initial Brief of Respondent on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on August 10, 2016, addressed as follows to all counsel of record:

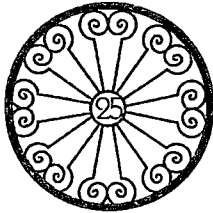
William S. Duncan, Esquire
Raymond C. Fischer, Esquire
Law Offices of William Stuart Duncan, P.A.
P. O. Drawer 736
Georgetown, SC 29442

YOUNG CLEMENT RIVERS, LLP

By: 
Catherine H. Chase

Charleston, South Carolina

Dated: August 10, 2016



YCR LAW

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

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50 YEARS

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August 10, 2016

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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AUG 12 2016

SC Court of Appeals

Re: Jack Woodward v. ArcelorMittal Georgetown, Inc.
Appellate Case No.: 2016-000507
YCR File: 902-20130988

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced appeal please find the original and six copies of Respondent's Second Motion for Extension of Time to File/Serve Initial Brief, along with a Proof of Service and this firm's check in the amount of \$25.00 for filing fees. Please file this motion and return one file-stamped copy to me in the envelope provided.

The deadline to file Respondent's Initial Brief and Designation of Matters is currently August 10, 2016. With this extension, Respondent's Initial Brief and Designation of Matters will be due on September 9, 2016.

By copy of this letter with the enclosure, I am notifying all counsel of record of my request for an extension.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me. With best regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Catherine H. Chase

CHC/tlb

Enclosures

cc (w/enc.): Raymond C. Fischer, Esquire, Law Offices of William Stuart Duncan, P.A.
William S. Duncan, Esquire, Law Offices of William Stuart Duncan, P.A.

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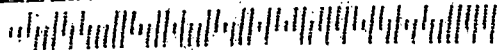
FIRST CLASS

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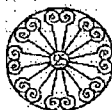


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