

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS COMPENSATION COMMISSION

RECEIVED

SEP 12 2016

SC Court of Appeals

Appellate Case No. 2016-001154

MATTHEW EDWARDS, EMPLOYEE Appellant,

v.

SC DEPARTMENT OF PUBLIC SAFETY, EMPLOYER AND
STATE ACCIDENT FUND, CARRIER, Respondents


MOTION FOR EXTENSION OF TIME

The Appellant, by and through his undersigned attorney, hereby moves this Court for an Order granting an extension of time in which to submit the Appellant's Initial Brief in the above-captioned matter. This motion is made upon the grounds that the case is voluminous and counsel needs additional time to prepare the brief.

The undersigned has consulted with counsel for the Respondent and he has no objection.

The transcript was received on July 13, 2016, making the Initial Brief originally due on August 12, 2016. Counsel previously agreed to an extension of time for the filing of the Initial Brief until September 12, 2016. At this time, counsel for the Appellant respectfully requests that an additional 7 day extension of time be granted to file the Initial Brief, making the due date September 19, 2016.

Respectfully submitted,



J. Kirkman Moorhead SC Bar No. 3571
KRAUSE, MOORHEAD AND DRAISEN, P.A.
207 E. Calhoun Street
Anderson, SC 29621
(864) 225-4000
Attorney for the Appellant

September 8, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
SEP 12 2016
SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS COMPENSATION COMMISSION

APPELLATE CASE NO. 2016-001154

MATTHEW EDWARDS, EMPLOYEE, Appellant,

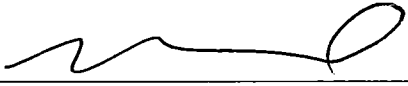
v.

S.C. DEPARTMENT OF PUBLIC SAFETY, EMPLOYER,
AND
STATE ACCIDENT FUND, CARRIER, Respondents

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time upon counsel for the Respondents via email and by depositing a copy of it in the United States Mail, postage prepaid, on September 8, 2016, addressed as follows:

Zachary M. Smith, Esq.
WILLSON, JONES, CARTER & BAXLEY
872 S. Pleasantburg Drive
Greenville, SC 29670



J. Kirkman Moorhead, Esq. SC Bar No. 7039
KRAUSE, MOORHEAD AND DRAISEN, P.A.
207 E. Calhoun Street
Anderson, SC 29621
(864) 225-4000
Attorney for the Appellant



KRAUSE MOORHEAD & DRAISEN P.A.

207 EAST CALHOUN STREET
ANDERSON • SOUTH CAROLINA • 29621
PHONE (864) 225-4000
FAX (864) 964-0788
WWW.KMDLAWYERS.COM

September 8, 2016

The Honorable Jenny Abbott Kitchings
CLERK OF THE COURT OF APPEALS
PO Box 11629
Columbia, SC 29211

RECEIVED
SEP 12 2016
SC Court of Appeals

**RE: Matthew Edwards v. SCDPS and State Accident Fund
Appellate Case No. 2016-001154**

Dear Ms. Kitchings:

Enclosed for filing you will find the original and six copies of my Motion for Extension of Time and Proof of Service for the above-captioned matter. I have enclosed a motion fee of \$ 25.00 to cover the cost of this extension.

The initial brief of the Appellant is due September 12, 2016. Due to a paralegal recently retiring, general work load and recent long-standing vacations over the long Labor Day holiday weekend additional time would be helpful to the Appellant. We respectfully request a one week an extension until September 19, 2016 to submit Appellant's Initial Brief.

I have consulted with counsel for the Respondents and he has no objection to the extension. I have served him with a copy of the motion as evidenced by our Proof of Service.

Thank you for your assistance in this matter and if you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely yours,

J. Kirkman Moorhead

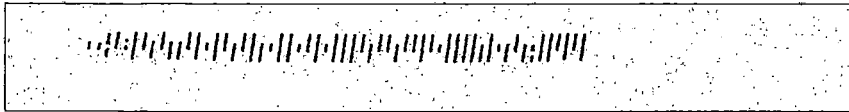
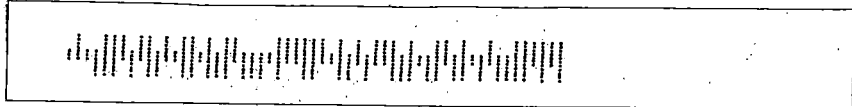
JKM
Enclosures

cc: Zachary M. Smith, Esq.





UNITED STATES POSTAGE
PITNEY BOWES
\$ 001.570
02 1P
0000289743 SEP 08 2016
MAILED FROM ZIP CODE 29621



KRAUSE MOORHEAD & DRAISEN, P.A.
207 East Calhoun Street
Anderson, South Carolina 29621

RECEIVED

SEP 12 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
CLERK OF THE COURT OF APPEALS
PO Box 11629
Columbia, SC 29211