

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

CROSS-APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

APPELLATE CASE NO. 2016-001509

RECEIVED

SEP 21 2016

SC Court of Appeals

James Lipscomb, Employee,

Respondent-Appellant,

v.

Stein Fibers/Innovative Fibers, Employer,  
and Key Risk Management, Carrier

Appellants-Respondents.

MOTION FOR EXTENSION OF TIME

The undersigned hereby moves for an extension of the time limit for filing the Respondent-Appellant's Reply Brief, as well as the Designation of Matter, until October 20, 2016. The reason for the necessity of the extension is as follows:

1. The attorney for Respondent-Appellant requires additional time to complete research to thoroughly address the issues being appealed by both parties.
2. The Respondent-Appellant's attorney has been out of the office for numerous court appearances for the past several weeks, which has hindered counsel's ability to refine the Initial Brief of the Respondent-Appellant, as well as the Respondent's Brief to the extent desired.

The grounds for this motion are the applicable laws of this State. It will be no hardship, prejudice, or impediment resulting from the filing of the Respondent-Appellant's Initial Brief, Respondent Brief and Designation of Matter out of time.

September 20, 2016



W. Scott Palmer  
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(803) 854-4417  
Attorney for Respondent-Appellant

J

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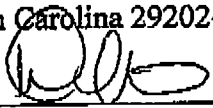
PROOF OF SERVICE

I do hereby certify that I have served the Motion for Extension of Time, in the above captioned case, on Appellants-Respondents' counsel Richard B. Kale, Jr., Esquire, as well as the South Carolina Workers' Compensation Commission, via First Class U.S. Mail, with the proper postage affixed thereto, to address listed below:

Richard B. Kale, Jr., Esquire  
Willson Jones Carter & Baxley, P.A.  
872 S. Pleasantburg Dr.  
Greenville, SC 29607

South Carolina Workers' Compensation Commission  
Post Office Box 1715  
Columbia, South Carolina 29202-1715

September 20, 2016

  
\_\_\_\_\_  
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September 20, 2016

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

**RECEIVED**

SEP 21 2016

**SC Court of Appeals**

Re: James T. Lipscomb v. Stein Fibers  
Appellate Case No.: 2016-001509

Dear Ms. Kitchings:

Enclosed for filing is a Motion for Extension of Time in the above case. Also enclosed is the following:

1. Proof of Service of the Motion for Extension of Time on the Appellants-Respondents.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



W. Scott Palmer  
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Post Office Box 722  
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(803) 854-4417  
Attorney for Respondent-Appellant

/pov  
enclosures

cc: Richard B. Kale, Jr., Esq.  
Willson Jones Carter & Baxley, P.A.  
872 S. Pleasantburg Dr.  
Greenville, SC 29607  
(864) 527-3272  
Attorney for Appellants-Respondents

cc: South Carolina Workers' Compensation Commission

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**FAX TRANSMITTAL SHEET**

**DATE: September 21, 2016**

**TO: The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals**

**RECEIVED**  
SEP 21 2016  
**SC Court of Appeals**

**FAX #: (803) 734-1839**

**FROM: W. Scott Palmer, Esquire**

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(including cover sheet)**

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