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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No.: 2016-001180

**RECEIVED**  
OCT 24 2016  
SC Court of Appeals

Kim E. Argo, Claimant, ..... Appellant,

v.

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

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S  
INITIAL REPLY 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 Reply Brief of Appellant and Designation of Matter to be included in the Record on Appeal. Respondents' Initial Brief was mailed on October 6, 2016 and received by Appellant's counsel on October, 11, 2016, making our Brief currently due on October 21, 2016. If the extension is granted, the Brief will be due on November 20, 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.

Respectfully Submitted:

  
Stephen B. Samuels  
SAMUELS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29250  
(803) 779-4000

October 21, 2016  
Columbia, South Carolina

Counsel for the Appellant

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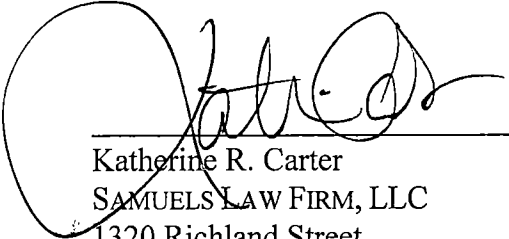
Flexible Technologies, Inc., Employer, and  
Liberty Insurance Corporation, Carrier, ..... Respondents.

PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **Motion for Extension of Time to File Appellant's Initial Reply Brief and Designation of Matter** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on October 21, 2016, addressed as follows:

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

October 21, 2016



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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

October 21, 2016

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

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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 **Motion for Extension of time to file Appellant's Initial Reply Brief and Designation of Matter and Proof of Service**, in the above case.

Please have your staff file the Motion for Extension of Time to file Appellant's Initial Reply 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

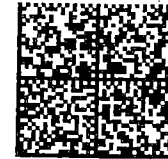
/krc


Enclosure(s) as stated

cc: L. Brenn Watson, Esq.

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