

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Case No.: 2016-001247

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NOV 07 2016

SC Court of Appeals

Thomas Contreras, Employee, Appellant

v.

St. Johns Fire District, Employer, and State Accident Fund, Carrier, Respondents

SECOND MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Respondents, by and through their undersigned attorneys hereby move before this Honorable Court for a 30 day extension to file their Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The brief and designation are currently due on November 9, 2016. This is Respondents' second request for an extension and need for an extension as the undersigned did not receive the Appellant's Initial Brief until September 29, 2016 and the Respondents' office was closed for three days due to Hurricane Matthew. If the Motion is granted, the due date will be extended to December 9, 2016. This is the Respondents' second request for an extension of time.

Respectfully Submitted,



Margaret Urbanic
Clawson and Staubes, LLC
126 Seven Farms Dr., Suite 200
Charleston, SC 29492

Page Snyder
State Accident Fund
P.O. Box 102100
Columbia, SC 29221

Charleston, SC
November 4, 2016

FILED
NOV 10 2016
CLERK OF COURT

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PROOF OF SERVICE

I certify that I have served the Second Motion for Extension of time to file Respondents' Initial Brief and Designation of Matter upon the Appellant by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below address as follows:

Stephen Samuels
Samuels Law Firm, LLC
1320 Richland Street
Columbia, SC 29201

Gary Christmas
Howell & Christmas, LLC
P.O. Box 1896
Mt. Pleasant, SC 29465


Margaret Urbanic

Charleston, South Carolina
November 4, 2016

CLAWSON
AND
STAUBES
LLC

Margaret M. Urbanic
Licensed in SC
purbanic@clawsonandstaubes.com
SC Certified Circuit Court Mediator

November 4, 2016

File No.: 20111005.000

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211-1629

Re: Thomas Contreras, Claimant, Appellant v. St. Johns Fire District Commission,
Employer, and State Accident Fund, Carrier, Respondents
Case No.: 2016-001247

Dear Ms. Kitchings:

Enclosed for filing please find an original and six (6) copies of a Second Motion for Extension to File Respondents' Initial Brief and Designation of Matter for the above referenced matter. Also enclosed is the Proof of Service for the Motion for an Extension. Since the State Accident Fund is a state agency and is exempt from the filing fee. I have enclosed a self-addressed, stamped, envelope for your convenience in returning a clocked copy of the Motion for Extension to my office.

Very truly yours,

CLAWSON and STAUBES, LLC



Margaret M. Urbanic

MMU/
Enclosures

cc: Stephen B. Samuels, Esq.
Gary Christmas, Esq.
Page Snyder, Esq.

**CLAWSON
AND STAUBES**

LLC

126 Seven Farms Drive, Suite 200
Charleston, SC 29492-8144

File #: 20111005.000

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11/04/2016

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The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
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