

81785

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Kristi Lea Harrington, Circuit Court Judge

Appellate Case No. 2016-001281

**RECEIVED**

DEC 02 2016

**SC Court of Appeals**

Joan Barra, Employee

v.

Charleston County, Self-Insured Employer, through the  
South Carolina Counties Workers' Compensation Trust, Carrier,

In Re: Charleston County and the South Carolina Counties  
Workers' Compensation Trust.....Respondents,

v.

South Carolina Second Injury Fund.....Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTER**

Due to unforeseen deadlines and commitments, the above-named Respondents respectfully request a thirty (30) day extension to file their Initial Brief and Designation of Matter.

Respectfully submitted,

*Kirsten L. Barr*

Kirsten Leslie Barr  
Trask & Howell, L.L.C.  
P.O. Box 2167  
Mt. Pleasant, SC 29465  
(843) 881-4228  
SC Bar No. 15525  
Attorneys for Respondents

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Kristi Lea Harrington, Circuit Court Judge

---

Appellate Case No. 2016-001281

---

**RECEIVED**  
DEC 02 2016  
SC Court of Appeals

Joan Barra, Employee

v.

Charleston County, Self-Insured Employer, through the  
South Carolina Counties Workers' Compensation Trust, Carrier,

In Re: Charleston County and the South Carolina Counties  
Workers' Compensation Trust.....Respondents,

v.

South Carolina Second Injury Fund.....Appellant.

---

**PROOF OF SERVICE**

---

The undersigned hereby certifies the above-referenced Appellant, the South Carolina Second Injury Fund, was served with a copy of the attached Motion for Extension of Time to File Initial Respondents' Brief and Designation of Matter this the 29th day of November 2016, by depositing a copy of the same in the United States Mail, first class postage prepaid, addressed to his attorney of record, as follows:

Latonya Dilligard Edwards, Esq.  
Dilligard Edwards, LLC  
3790 Fernandina Road, Suite 103  
Columbia, SC 29210

November 29, 2016

*Kirsten Leslie Barr*

---

Kirsten Leslie Barr  
Trask & Howell, L.L.C.  
P.O. Box 2167  
Mt. Pleasant, SC 29465  
(843) 881-4228  
SC Bar No. 15525  
Attorneys for Respondents



HAROLD E. TRASK  
 ROY A. HOWELL, III  
 KIRSTEN L. BARR  
 JAMIE C. GUERRERO  
 JILL W. KING

**TRASK & HOWELL, L.L.C.**

*Workers' Compensation Defense*

PHONE  
 (843) 881-4228  
 FAX  
 (843) 881-8784

CHRISTIAN E. FOBER  
 EVELYN A. NORTON

763 JOHNNIE DODDS BOULEVARD  
 P. O. Box 2167  
 MT. PLEASANT, SC 29465

E-MAIL  
 KBARR@TRASK-HOWELL.COM  
 DIRECT DIAL: (843) 881-1027

November 29, 2016

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

**RECEIVED**  
 DEC 02 2016  
 SC Court of Appeals

Re: Joan Barra v. Charleston County  
 W.C.C. File No.: 9613486  
 SIF No.: 51595  
 Case No.: 2016-001281  
 Carrier File No.: 36516  
 Date of Accident: April 30, 1996

Dear Ms. Kitchings:

Enclosed herewith for filing, please find the original and six (6) copies of our Motion for Extension of Time to File Initial Brief of the Respondents and Designation of Matter, along with our original Proof of Service of the same in the above-named matter. By a copy of this correspondence, I am serving the other counsel of record with a copy of our Motion. Also enclosed, please find our check in the amount of \$25.00 for the filing of this Motion.

Yours very truly,

*Kirsten L. Barr*

Kirsten L. Barr

KLB/cnc/les

Enc.

cc: Gene Jarrett, Ariel TPA (w/enc.) (email only)  
 Mike Schwerin, Charleston County (w/enc.)  
 Lang Kohel, S.C. Association of Counties (w/enc.) (email only)  
 Latonya Dilligard Edwards, Esq. (w/enc.)

1165\110\1-Court of Appeals Motion for Ext to File Initial Res Brief

J



TRASK & HOWELL, LLC  
P.O. BOX 2167  
MT. PLEASANT, SC 29465



U.S. POSTAGE >> PITNEY BOWES



ZIP 29464 \$ 002.62<sup>0</sup>  
024W  
0000332787 NOV. 29. 2016

**RECEIVED**

DEC 02 2016

SC Court of Appeals

1165/110  
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

