

81888

RECEIVED

DEC 12 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

APPELLANT PANEL
The Honorable Gene McCaskill, The Honorable Aisha Taylor
and The Honorable Avery B. Wilkerson, Jr.

Case No. 2016-002148

Jose Martinez

v.

Jose Efrain Henriquez Salgado; Farley Construction; Auto-Owners Insurance Company;
and Builders Mutual Insurance Company,

Of whom Jose Efrain Henriquez Salgado and Auto-Owners Insurance Company are the
Appellants,

And

Jose Martinez, Farley Construction Co., and Builders Mutual Insurance Company are
the Respondents.

MOTION FOR EXTENSION OF TIME

This Motion of the Respondents, Farley Construction Co. and Builders Mutual Insurance Company, seeks an Order of this Court, pursuant to Rule 240, SCACR, extending the time to file its Initial Brief and Designation of Matter in the above-captioned appeal. The ground for this Motion is that Respondents' Initial Brief and Designation of Matter are currently due between holidays on December 28, 2016; counsel's workload will

prevent preparation of these documents within the time required by Rules 208(b) and 209, SCACR; no extensions have been previously requested; and undersigned has consulted with counsel for all other parties to the appeal and all parties consent to the request for an extension. This Motion is not made for purposes of undue delay or any other improper purpose.

THEREFORE, the Respondents, Farley Construction Co. and Builders Mutual Insurance Company, request an Order extending the time to file the Initial Brief and Designation of Matter of Respondents, Farley Construction Co. and Builders Mutual Insurance Company, for fifteen (15) days making the due date January 12, 2017.

RESPECTFULLY SUBMITTED,



George A. Taylor
CALLISON TIGHE & ROBINSON, LLC
Post Office Box 1390
Columbia, SC 29202-1390
Telephone: (803) 404-6900
Facsimile: (803) 404-6901

ATTORNEYS FOR RESPONDENTS
FARLEY CONSTRUCTION CO. AND
BUILDERS MUTUAL INSURANCE COMPANY

Columbia, South Carolina

December 12, 2016

RECEIVED

DEC 12 2016

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

APPELLANT PANEL
The Honorable Gene McCaskill, The Honorable Aisha Taylor
and The Honorable Avery B. Wilkerson, Jr.

Case No. 2016-002148

Jose Martinez

v.

Jose Efrain Henriquez Salgado; Farley Construction; Auto-Owners Insurance Company; and
Builders Mutual Insurance Company,

Of whom Jose Efrain Henriquez Salgado and Auto-Owners Insurance Company are the
Appellants,

And

Jose Martinez, Farley Construction Co., and Builders Mutual Insurance Company are the
Respondents.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on the Appellants and
Respondent, Jose Martinez, by depositing a copy of it in the United States Mail, first-class postage
prepaid, on December 12, 2016, addressed to their attorney of record, Frank Reid Warder, Jr.,
Esquire, PO Box 31057, Charleston, SC 29417; John Davis Stroud, Esquire, 3 Oak Forest Dr.,
Charleston, SC 29407; and Joseph R. Baldwin, Esquire, 806 West Poinsett Dr., Greer, SC 29650.


Melinda C. Etheridge

Senior Workers' Compensation Paralegal
CALLISON TIGHE & ROBINSON, LLC

Post Office Box 1390

Columbia, SC 29202-1390

Telephone: (803) 404-6900

Facsimile: (803) 404-6901

ATTORNEYS FOR RESPONDENTS

FARLEY CONSTRUCTION CO. AND

BUILDERS MUTUAL INSURANCE COMPANY

December 12, 2016

GEORGE A. TAYLOR- Associate
803-404-6964
GeorgeTaylor@callisontighe.com

CALLISON  TIGHE

December 12, 2016

RECEIVED

DEC 12 2016

SC Court of Appeals

VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, Court of Appeals
1015 Sumter Street
Columbia, SC 29211

**Re: Jose Martinez v. Jose Salgado
Appellate Case No. 2016-002148
Our File No. 3399.463**

Dear Ms. Kitchings:

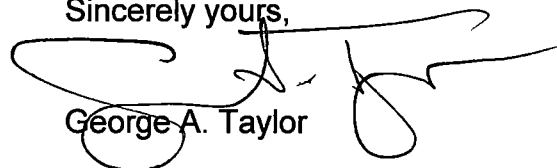
Enclosed for filing please find the original and six copies of a Motion for an Extension of Time in the above-referenced action, along with this firm's check in the amount of \$25.00 for the motion fee. Please file the original and return a clocked-in copy to our office by our courier.

By copy of this letter, I am serving same upon all counsel of record.

Thank you for your assistance in this matter.

With kind regards, I am

Sincerely yours,



George A. Taylor

GAT/mce
Enclosures

cc: Frank Reid Warder, Jr., Esquire (w/enclosures)
John Davis Stroud, Esquire (w/enclosures)
Joseph R. Baldwin, Esquire (w/enclosures)
The Honorable Amy Bracy (w/enclosures)
Janey Wilson, Builders Mutual Insurance Company (w/enclosures)

CALLISON  TIGHE

RECEIVED

DEC 12 2016

SC Court of Appeals

VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings

Clerk, Court of Appeals

1015 Sumter Street

Columbia, SC 29211