

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY

South Carolina Workers' Compensation Commission Appellate

Panel Appellate Case No. 2016-002148

**RECEIVED**

MAR 10 2017

**SC Court of Appeals**

Jose Martinez, Respondent,

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

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

MOTION TO ALLOW LATE FILING OF THE RECORD ON APPEAL

COMES now Appellants Jose Efrain Henriquez Salgado and Auto-Owners Insurance Company, by and through their undersigned counsel, hereby moves this Honorable Court to allow Appellants to file the Record on Appeal a day late. The grounds for said motion are as follows:

1. The Record on Appeal was due on March 8, 2017.
2. Appellants delivered the record of appeal to a print shop, with instructions to make the required amount of copies in the form described in Rule 267, SCACR.
3. Appellants received the copies on March 8, 2017, and discovered that the copies of

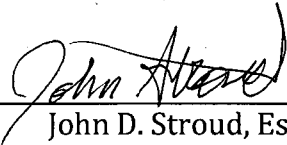
the Record on Appeal were not front and back copies. The print shop only made one-sided copies of a double-sided Record on Appeal, meaning every other page was missing from the Record on Appeal.

4. Appellants received corrected copies on March 9, 2017, and are filing them immediately.

WHEREFORE, Appellants respectfully request that the Court allow Appellants to file the Record on Appeal a day late.

March 9, 2017

RESPECTFULLY SUBMITTED:  
Warder Law Firm, LLC  
P.O. Box 31057  
Charleston, SC 29407

  
\_\_\_\_\_  
John D. Stroud, Esq.  
(843) 556-4400  
Attorney for Appellants

RECEIVED

MAR 10 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM RICHLAND COUNTY

South Carolina Workers' Compensation Commission Appellate Panel

Appellate Case No. 2016-002148

Jose Martinez, Respondent,

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,

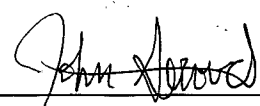
And

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

PROOF OF SERVICE

I certify that I have served the Motion to Allow Late Filing of Record on Appeal, as well as a copy of the Record on Appeal, upon Respondents Jose Martinez, Farley Construction Company, and Builders Mutual Insurance Company, by depositing a copy of it in the United States Mail, postage prepaid, on March 9, 2017, addressed to the following: Joseph R. Baldwin, Esq., 306 W. Poisett Street, Greer SC 29650; and George A. Taylor, Esq., P.O. Box 1390, Columbia SC 29202-1390.

March 9, 2017

  
F. Reid Warder, Jr., Esq.  
John D. Stroud, Esq.  
P.O. Box 31057  
Charleston, SC 29417  
(843) 556 - 4400  
Attorneys for Appellant

5

**WARDER**  
LAW FIRM LLC

F. REID WARDER, JR  
—  
JOHN D. STROUD

TEL 843.556.4400  
FAX 843.556.4410

PO BOX 31057  
CHARLESTON, SC 29417

3 OAK FOREST DRIVE  
CHARLESTON, SC 29407

---

March 9, 2017

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

**RECEIVED**

MAR 10 2017

SC Court of Appeals

RE: Jose Martinez vs. Jose Efrain Henriquez Salgado; Farley Construction; Auto-Owners Insurance Company; and Builders Mutual Insurance Company; Appellate Case Number 2016-002148

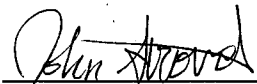
Dear Clerk of Court:

Enclosed for filing in the above captioned matter please find 15 copies of the Record on Appeal pursuant to Rule 210 and 267(d), SCACR. Also enclosed please find a Motion to Allow Late Filing of the Record on Appeal, as the Record on Appeal was due yesterday. Also enclosed, please find the \$25.00 filing fee for the enclosed Motion.

Additionally, upon review of my certificate of service of the final briefs, I noticed an error in the date of service. I have enclosed a corrected certificate of service, which has the correct date on March 8, 2017. I apologize for this oversight, and request the Court accept this certificate of service of the final briefs.

Thank you for your time and attention to this matter. If you have any questions or concerns, please do not hesitate to contact me. By copy of this letter, I am serving the same upon all counsel of record.

Sincerely,



John D. Stroud, Esq.  
Warder Law Firm, LLC  
P.O. Box 31057  
Charleston, SC 29417

cc: Joseph R. Baldwin, Esq.  
George A. Taylor, Esq.