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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE APPELLATE PANEL OF THE SOUTH
CAROLINA WORKERS' COMPENSATION COMMISSION

CASE NUMBER 2016-002321

David B. Lemon,)
)
 Claimant, Appellant,)
)
 -vs.-)
)
 Mt. Pleasant Waterworks,)
)
 Employer,)
 and)
)
 State Accident Fund,)
)
 Carrier, Respondents.)
)

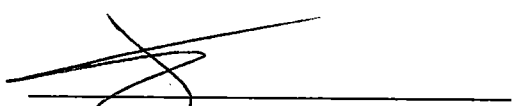
MOTION TO ALLOW LATE FILING

TO: THE S.C. COURT OF APPEALS AND J. GABRIEL COGGIOLA, ATTORNEY FOR RESPONDENTS

The Appellant above named, moves the Court to allow the late filing of the Initial Reply Brief. The basis for the Motion is that Appellant's Counsel was out of the office and on vacation when the Respondents' Initial Brief was served and Appellant's Counsel miscalculated the time that the Initial Reply Brief was due.

Wherefore, Appellant moves the Court for an Order permitting the late filing of the Initial Reply Brief.

Respectfully submitted,



Carl H. Jacobson
Post Office Box 399
Charleston, SC 29402
(843) 723-7491
Attorney for Appellant

March 22, 2017

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE APPELLATE PANEL OF THE SOUTH
CAROLINA WORKERS' COMPENSATION COMMISSION

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PROOF OF SERVICE

I certify that I have served the Motion to Allow Late Filing to be included in the Record on Appeal by depositing a copy of it in the United States Mail, postage prepaid, on March 22, 2017, addressed to the attorney of record, J. Gabriel Coggiola, 421 Wando Park Blvd., Suite 100, Mt. Pleasant, SC 29464 [by certified mail with return receipt requested on March 22, 2017].

March 22, 2017



Carl H. Jacobson
Post Office Box 399
Charleston, SC 29402-0399
(843) 723-7491
Attorney for Appellant

URICCHIO, HOWE, KRELL, JACOBSON, TOPOREK, THEOS & KEITH, P.A.

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17½ BROAD STREET
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March 22, 2017

The Honorable Jenny Abbott Kitchings
The S.C. Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: David Lemon, Employee, Appellant vs.
Mt. Pleasant Waterworks, Employer, and
State Accident Fund, Carrier, Respondents
Case No. 2016-002321
Appellate Case No.: 2016-002321

Dear Ms. Kitchings:

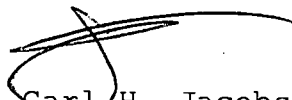
Enclosed please find the Claimant's Motion to Allow Late Filing in regards to the above matter along with the \$25.00 filing fee.

By copy of this letter, I am providing Attorney John Gabriel Coggiola with a copy of the same.

With kindest personal regards, I am

Sincerely,

URICCHIO, HOWE, KRELL, JACOBSON,
TOPOREK, THEOS & KEITH, P.A.

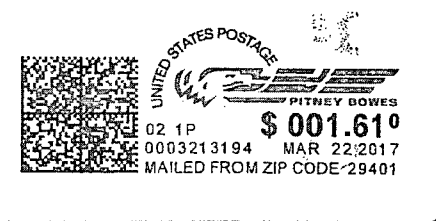
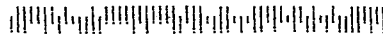

Carl H. Jacobson

CHJ/sec

Enclosures

cc: David Lemon

John Gabriel Coggiola, Esq. (cert. r/r/r)



URICCHIO, HOWE, KRELL, JACOBSON, TOPOREK, THEOS & KEITH, P.A.
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CHARLESTON, SC 29402-0399

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