

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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MAR 31 2017

SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No. 2016-002266

Renee Robles, Employee, Claimant,Appellant,

v.

Party Reflections, Inc., Employer, and
Employers Assurance Company, Carrier, Respondents,

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

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT
OF APPEALS:

Pursuant to Rule 240, SCACR, Respondents respectfully move this
Court for an Order granting them an extension of time in which to file and
serve their Initial Brief and Designation of Matter.


Counsel for Respondents have been conscientious in their efforts to prepare Respondents' Initial Brief and Designation of Matter; however, because of the complexity of many of the legal issues attendant in this case, counsel projects they will require additional time to complete their Initial Brief and Designation of Matter. The current deadline is March 31, 2017. Respondents request a thirty (30) day extension, which would place the new deadline at May 1, 2017. This is Respondents first request for extension in this matter.

Counsel for Respondents has consulted with Appellant's counsel who advised he does not oppose this motion.

Respondents greatly appreciate the Court's time, attention, and assistance with regard to this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,
COLLINS & LACY, P.C.

By: 
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ATTORNEYS FOR RESPONDENTS

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

Columbia, South Carolina
March 31, 2017

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v.

Party Reflections, Inc., Employer, and
Employers Assurance Company, Carrier, Respondents,

PROOF OF SERVICE

I hereby certify that I served the Notice of Appearance of Counsel for Respondents upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on March 31, 2017, addressed to the following:

COUNSEL SERVED:
Stephen B. Samuels, Esquire
Samuels Law Firm, LLC
1320 Richland Street
Columbia, SC 29201

and

Mark R. Calhoun, Esquire
Calhoun Law Firm
714 East Main Street
Lexington, SC 29072
COUNSEL FOR APPELLANT

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SC Court of Appeals

Respectfully submitted,
COLLINS & LACY, P.C.

By: 
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ATTORNEYS FOR RESPONDENTS

**PROOF OF SERVICE –
MOTION FOR EXTENSION OF
TIME TO FILE RESPONDENTS’
INITIAL BRIEF AND
DESIGNATION OF MATTER**

Columbia, South Carolina
March 31, 2017



Kelsey J. Brudvig | D: 803.255.0418 | E: kbrudvig@collinsandlacy.com

March 31, 2017

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

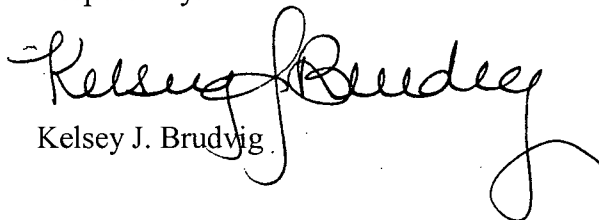
Re: *Robles v. Party Reflections, Inc.*
Appellate Case No. 2016-002266
C&L File No. 001655-00857

Dear Ms. Kitchings:

Please find enclosed the unbound originals and seven (7) copies each of Counsel for Respondents' Notice of Appearance and Motion for Extension of Time to file Respondents' Initial Brief and Designation of Matter in connection with the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the motion filing fee. Please file the originals and return one copy of each to us via our courier.

By copy of this letter to counsel of record, we are serving same on them.

Respectfully,


Kelsey J. Brudvig

KJB/mmm
Enclosures

cc: Stephen B. Samuels, Esquire
Mark R. Calhoun, Esquire