

82955

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION  
Appellate Panel

SCWCC No.: 1205647

**RECEIVED**

APR 03 2017

**SC Court of Appeals**

O'Shea L. Brown, Claimant.....Appellant

v.

Steel Technologies, Employer and

Twin City Fire Ins. Co., Carrier.....Respondents.

**Appellate Case No. 2016-001992**

---

**MOTION TO ALLOW LATE FILING**

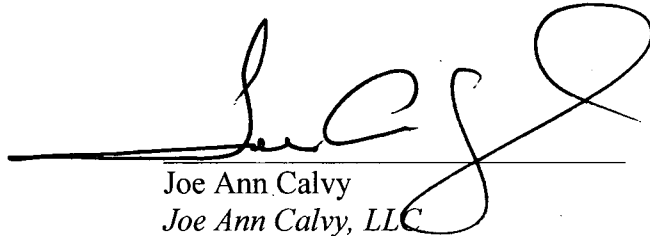
---

Pursuant to Rule 211(a) SCACR, the Final Appellant Brief and Final Reply Brief are due within 20 days after service of the Record on Appeal. The undersigned mistakenly marked the due date to file the same 30 days out instead of 20 days. The Briefs were due on March 23, 2017.

This case is properly captioned and all previous deadlines have been met. Accordingly, the undersigned pleads with the Court to not let the Appellant be prejudiced by this mistake.

The undersigned hereby moves the Court to allow this late filing. The Final Appellant Brief and Reply Brief are being filed today.

This motion conforms with Rule 240 and Rule 267, SCACR.

A handwritten signature in black ink, appearing to read "Joe Ann Calvy", is written over a horizontal line. The signature is stylized and cursive.

Joe Ann Calvy  
*Joe Ann Calvy, LLC*  
P.O. Box 610  
Kingstree, SC 29556  
Telephone: (843) 354-5504  
Facsimile: (843) 354-5845  
Attorney for Appellant

9

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION  
Appellate Panel

SCWCC No.: 1205647

**RECEIVED**

APR 03 2017

**SC Court of Appeals**

O'Shea L. Brown, Claimant.....Appellant

v.

Steel Technologies, Employer and

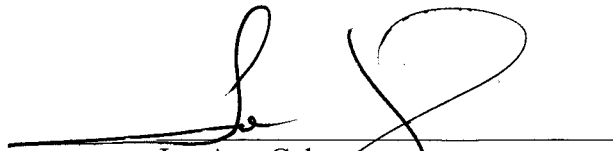
Twin City Fire Ins. Co., Carrier.....Respondents.

**Appellate Case No. 2016-001992**

**PROOF OF SERVICE**

I CERTIFY that I have served the Final Brief of Appellant, the Reply Brief of Appellant, and Motion to Allow Late Filing, by depositing a copy of them in the United States Mail, postage prepaid, on March 31, 2017, addressed to their attorney of record:

Matthew C. LaFave, Esquire  
CROWE LAFAVE  
Post Office Box 1149  
Columbia, S. C. 29202



Joe Ann Calvy  
*Joe Ann Calvy, LLC*  
.P.O. Box 610  
Kingstree, SC 29556  
Telephone: (843) 354-5504  
Facsimile: (843) 354-5845  
Attorney for Appellant



# Joe Ann Calvy, LLC

ATTORNEY AT LAW

P.O. Box 610 • 209 W. MILL STREET • KINGSTREE, SC 29556

TELEPHONE: (843) 354-5504

FAX: (843) 354-5845

E-MAIL: JCALVY@SC.RR.COM

PAGER: 1-800-800-9698

March 31, 2017

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

**RECEIVED**

APR 03 2017

SC Court of Appeals

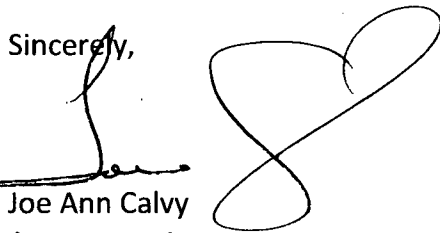
Re: O'Shea L. Brown vs. Steel Technologies and Twin City Fire Ins. Co.  
Appellate Case No. 2016-001992

Dear Ms. Kitchings:

Enclosed please find 15 copies of the Final Appellant Brief and 15 copies of the Final Reply Brief, and original and one copy of the Proof of Service. Please return a copy of the Proof of Service.

I have also enclosed an original and copy of my Motion to Allow Late Filing along with Proof of Service.

Sincerely,

  
Joe Ann Calvy  
Attorney at Law

enc:

cc: Matthew LaFave (w/copy of Final Appellant Brief and Proof of Service, Motion to Allow Late Filing)

FROM: (803) 413-5875  
Joe Ann Calvy, LLC  
209 West Mill Street  
KINGSTREE SC 29556  
US

SHIP DATE: 31MAR17  
ACTWGT: 8.55 LB  
CAD: 105704925/INNET3850  
BILL SENDER

TO The Honorable Jenny Abbot Kitchens  
SC Court of Appeals  
1220 Senate Street

COLUMBIA SC 29201  
(803) 734-1890

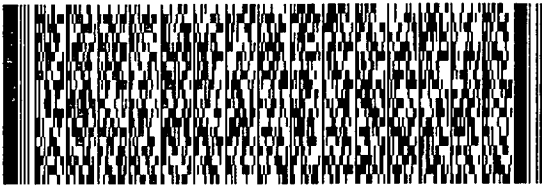
(US)

546.03/ADB63C1

INV:  
PO:

REF:

DEPT:



FedEx  
Ground



J17117021401w

TRK# 7787 9697 9456

29201

9622 0019 0 (000 000 0000) 0 00 7787 9697 9456



**RECEIVED**

APR 03 2017

SC Court of Appeals