

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No. 2016-002266

RECEIVED

MAY 17 2017

SC Court of Appeals
83450

Renee Robles, Employee, Claimant,Appellant,

v.

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

**RESPONDENTS' MOTION TO FILE
OUT OF TIME THEIR REPLY TO APPELLANT'S
RETURN TO MOTION TO DISMISS APPEAL**

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

Respondents Party Reflections, Inc. and Employers Assurance Company ("Respondents") respectfully move this Court for an Order granting them leave to file Respondents' Reply to Appellant's Return to Motion to Dismiss Appeal.

The grounds for this motion are that while Appellant did serve his Return to Respondents' Motion to Dismiss Appeal on May 11, 2017, Respondents did not receive said Return in the mail until May 15, 2017, the date Respondents' Reply to Appellant's Return was due. Once the Return was received, undersigned counsel prepared Respondents' Reply as expeditiously as possible, but was not able to have the Reply ready in time for service in the mail on May 16, 2017.

Counsel for Respondents' represents to this Court she has contacted Counsel to Appellant to request consent to this Motion, but no response was forthcoming.

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

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

COLLINS & LACY, P.C.

By: 
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ATTORNEYS FOR RESPONDENTS

**RESPONDENTS' MOTION TO FILE
OUT OF TIME THEIR REPLY TO
APPELLANT'S RESPONSE TO
MOTION TO DISMISS APPEAL**

Columbia, South Carolina
May 17, 2017

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Party Reflections, Inc., Employer, and
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PROOF OF SERVICE

I hereby certify that I served **RESPONDENTS' MOTION TO FILE OUT OF TIME THEIR REPLY TO APPELLANT'S RETURN TO MOTION TO DISMISS APPEAL** upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on May 17, 2017, addressed to the following:

COUNSEL SERVED:

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

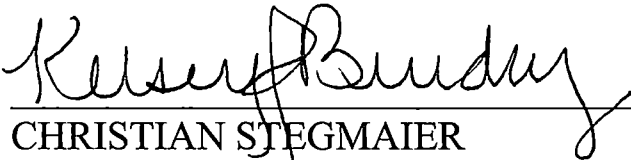
COUNSEL FOR APPELLANT

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

COUNSEL FOR APPELLANT

Respectfully submitted,

COLLINS & LACY, P.C.

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ATTORNEYS FOR RESPONDENTS

**PROOF OF SERVICE -
RESPONDENTS' MOTION TO FILE
OUT OF TIME THEIR REPLY TO
APPELLANT'S RESPONSE TO
MOTION TO DISMISS APPEAL**

Columbia, South Carolina
May 17, 2017



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

May 17, 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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MAY 17 2017

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 Respondents' Motion to File Out of Time and Reply to Appellant's Return to Respondents' Motion to Dismiss Appeal 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.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,

A handwritten signature in black ink that reads "Kenny Bundy for". The signature is written in a cursive style and is positioned above the printed name of the signatory.

Christian Stegmaier

CS/mmm

Enclosures

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