

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2017-000753

Donnie Lowe, Employee, Claimant, Appellant,

v.

BMW Manufacturing Corporation, Employer, and Hartford Ins. Co. of the Midwest c/o  
Sedgwick Claims Management Services, Inc., Carrier, Respondents.

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SEP 07 2017

SC Court of Appeals

**NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME IN WHICH TO  
FILE FINAL BRIEF OF RESPONDENTS**

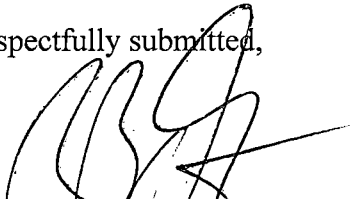
TO: THE HONORABLE JENNY ABBOTT KITCHINGS, CLERK OF COURT OF THE  
SOUTH CAROLINA COURT OF APPEALS; and MITCHELL K. BYRD, JR.,  
ESQUIRE, ATTORNEY FOR DONNIE LOWE, APPELLANT.

BMW Manufacturing Corporation and Hartford Ins. Co. of the Midwest c/o Sedgwick  
Claims Management Services, Inc., Respondents, respectfully request additional time in which to  
file the Final Brief of Respondents in this matter. Respondents' Final Brief is due to be filed on  
September 5, 2017. Because of the Labor Day holiday and Respondents having to outsource  
their Final Brief for binding, Respondents have been unable to complete and file their Final  
Brief.

Accordingly, counsel for Respondents respectfully requests that this Court permit him to  
submit and file the Final Brief of Respondents within thirty (30) days or on or before October 5,  
2017.

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Respectfully submitted,



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Brad B. Easterling, S.C. Bar No. 70328  
McAngus, Goudelock & Courie LLC  
Post Office Box 2980  
55 East Camperdown Way, Suite 300 (29601)  
Greenville, South Carolina 29602  
(864) 239-4000

Attorney for Respondents

Greenville, South Carolina  
September 5, 2017

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE WORKERS' COMPENSATION COMMISSION

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Appellate Case No. 2017-000753

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Donnie Lowe, Employee, Claimant, Appellant,

v.

BMW Manufacturing Corporation, Employer, and Hartford Ins. Co. of the Midwest c/o  
Sedgwick Claims Management Services, Inc., Carrier, Respondents.

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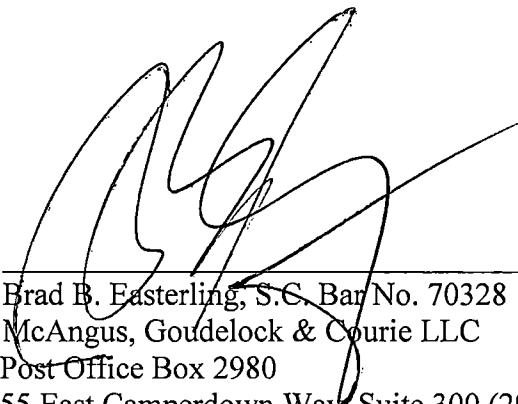
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I certify that I have served the Notice of Motion and Motion for Extension of Time in Which to File Final Brief of Respondents on the attorney of record for Donnie Lowe, by depositing a copy of it in the United States Mail, postage prepaid, on the 5th day of September, 2017, addressed to his attorney of record,

Mitchell K. Byrd, Jr., Esquire  
The Carolina Law Group  
910 East Washington Street  
Greenville, South Carolina 29601

September 5, 2017



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Brad B. Easterling, S.C. Bar No. 70328  
McAngus, Goudelock & Courie LLC  
Post Office Box 2980  
55 East Camperdown Way, Suite 300 (29601)  
Greenville, South Carolina 29602  
(864) 239-4000

Attorneys for Respondent

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SC Court of Appeals

**Reply To**

BRAD B. EASTERLING  
Direct Dial: (864) 239-6736  
brad.easterling@mgclaw.com

September 5, 2017

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

Re: Donnie K Lowe vs. BMW Manufacturing Co. LLC  
Appellate Case No. 2017-000753  
Claim No.: YMG72538C  
Our File No.: 20194.14123

Dear The Honorable Kitchings:

This letter serves as our request for a 30-day extension to file the Final Brief of Respondents in the above-referenced matter. This is Appellant's first request for an extension. Please find enclosed our check in the amount of \$25 for filing the extension.

The Final Brief of Respondents is currently due on September 5, 2017, and with the 30-day extension, the Final Brief will be due on October 5, 2017.

If you have any questions, please contact me.

Very truly yours,

Brad B. Easterling

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SC Court of Appeals

BBE/ma

Enclosures

cc: Mitchell K. Byrd Jr., Esquire, The Carolina Law Group

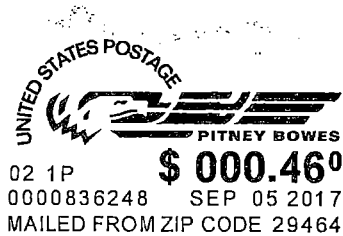
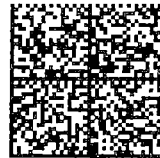
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**INSURANCE  
DEFENSE**

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**20194.14123/BBE/ma**

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

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Court of Appeals

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