

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Op. No. 5185 (S.C.Ct.App. filed November 27, 2013)
Op. No. 2016-UP-139 (S.C.Ct.App. filed March 30, 2016)

Hector G. Fragosa, Employee/Claimant, Petitioner,

v.

Kade Construction, LLC, Employer, and
Key Risk Management Services, Inc., Carrier, Respondents.

MOTION FOR EXTENSION OF TIME TO FILE PETITIONER'S BRIEF

Petitioner, by and through his undersigned attorney, hereby moves this Honorable Court for a 7-day extension in which to file the Brief of Petitioner. The Brief is currently due on September 21, 2017. If the extension is granted, the Brief will be due on September 28, 2017. As grounds for this Motion, Petitioner would show additional time is needed as completion and binding of the brief has been delayed as briefing Counsel is a solo practitioner who had been out of the country for 10 days during the briefing period; was delayed by the press of business; and was unable to work at his office this past weekend as the chimney and roof were undergoing major repairs.

Jeff C. Chandler
CHANDLER LAW FIRM
Bank of America Building
2501 North Oak Street
Myrtle Beach, SC 29577
(843) 448-4357
jeffcchandler@aol.com


Stephen B. Samuels
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000
stephen@samuelslawfirm.net

September 18, 2017

ATTORNEYS FOR PETITIONER

RECEIVED

SEP 20 2017

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

SEP 20 2017

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

S.C. SUPREME COURT

Op. No. 2016-UP-139 (S.C.Ct.App. filed March 30, 2016)

Hector G. Fragosa, Employee/Claimant, Petitioner,

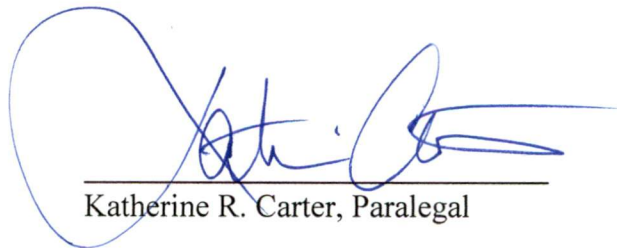
v.

Kade Construction, LLC, Employer, and
Key Risk Management Services, Inc., Carrier, Respondents.

PROOF OF SERVICE

I certify that I am paralegal to Stephen B. Samuels and I have caused a copy of the **Motion for Extension of Time to File Brief of Petitioner** to be served by mailing a copy of the same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on September 20, 2017, addressed as follows:

Michael W. Burkett, Esquire
J. Gabriel Coggiola, Esquire
Willson Jones Carter & Baxley, P.A.
3600 Forest Drive, Suite 204
Columbia, South Carolina 29204



Katherine R. Carter, Paralegal

September 20, 2017
Columbia, South Carolina