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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION
APPELLATE PANEL

Appellate Case No. 2017-001027
W.C.C. File No. 1019167

Seahray Brailsford, Employee, Claimant,.....Appellant,

v.

Piggly Wiggly Carolina Company, Inc., Employer, and Constitution
State Service Company as TPA for Greenbax Enterprise Inc., Carrier,..... Respondents.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME
TO FILE THEIR INITIAL BRIEF AND DESIGNATION
OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL**

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SC Court of Appeals

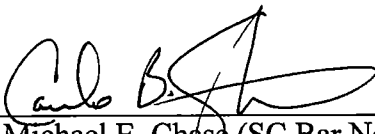
Pursuant to Rule 240 of the South Carolina Rules of Appellate Practice, Piggly Wiggly Carolina Company, Inc., and Constitution State Service Company as TPA for Greenbax Enterprise Inc. (hereinafter "Respondents") move this Court for an Order granting an extension of time during which to file their Initial Brief and Designation Of Matter To Be Included In The Record On Appeal. For the reasons set forth below, Respondents request an additional period of thirty days from September 29, 2017, during which to file these documents.

The additional time requested, beyond the extension of time previously granted by the Court, is warranted given the complexity of the legal issues presented. The thirty-day extension will not prejudice Respondents or Appellant or affect their legal rights.



Respondents intend to work diligently and to file their Initial Brief and Designation Of Matter as soon as practicable. However, for the reasons stated above, Respondents respectfully request that the Court grant a thirty-day extension of time during which it may file their Initial Brief and Designation Of Matter.

September 22, 2017

By: 
Michael E. Chase (SC Bar No. 15230)
Carmelo B. Sammataro (SC Bar No. 69746)
TURNER PADGET GRAHAM & LANEY, P.A.
Post Office Box 1473
Columbia, SC 29202
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ATTORNEYS FOR RESPONDENTS

Turner | Padget

Carmelo B. Sammataro

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September 22, 2017

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Seeahray Brailsford v. Piggly Wiggly Carolina Company, Inc. and Constitution
State Service Company as TPA for Greenbax Enterprise Inc.
Appellate Case No.: 2017-001027
W.C.C. File No.: 1019167
File No.: 5881.130


Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondents' Motion For Extension Of Time To File Their Initial Brief And Designation Of Matter To Be Included In The Record On Appeal regarding the above-referenced matter. Also enclosed are the original and one copy of the Proof of Service and our check for the filing fee. Please file the original filings and return clocked copies to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Carmelo B. Sammataro

CBS/tj

Enclosures

cc: Seeahray Brailsford, Appellant *pro se* (w/enc.)

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Seeahray Brailsford, Employee, Claimant,.....Appellant,

v.

Piggly Wiggly Carolina Company, Inc., Employer, and Constitution
State Service Company as TPA for Greenbax Enterprise Inc., Carrier,..... Respondents.

PROOF OF SERVICE

I certify this 22nd day of September 2017 that I have served a copy of RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE THEIR INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL upon Appellant *pro se*, by mailing same, postage prepaid in the United States mail, addressed to the following:

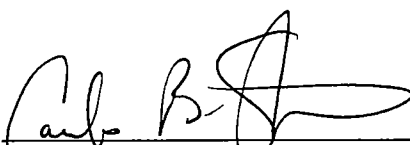
Seeahray Brailsford
322 Rice Road
Newberry, SC 29108
APPELLANT, *PRO SE*

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(Signature page to follow.)

September 22, 2017

By:



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