

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

RECEIVED

OCT 17 2017

S.C. SUPREME COURT

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 RESPONDENTS'
RETURN
TO BRIEF OF PETITIONER**

Respondents, by and through their undersigned counsel, hereby moves this honorable court for a thirty (30) day extension in which to file respondents returned to brief of petitioner. Respondents return is currently due on October 27, 2017. If the extension is granted, the brief will be due on November 26, 2017. As grounds for this motion, Respondents would show that additional time is needed as briefing counsel has numerous case presently before the South Carolina Court of Appeals and South Carolina Supreme Court which require the filing of briefs.



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

October 17, 2017
Columbia, South Carolina

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)

RECEIVED

OCT 17 2017

S.C. SUPREME COURT

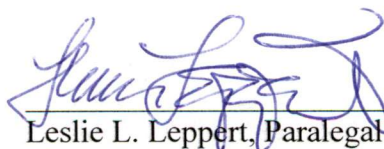
Hector G. Fragosa, Employee/Claimant,.....Petitioner,
v.
Kade Construction, LLC Employer and
Key Risk Management Services, Inc. Carrier, Respondents.

PROOF OF SERVICE

The undersigned certifies that on the date indicated below, I served counsel for Petitioner with a copy of **Respondents' Motion for Extension of Time to File Return to Brief of Petitioner** by mailing copies of the same by United States Mail postage prepaid on October 17, 2017 to the following addresses:

Stephen B. Samuels
Samuels Law Firm, LLC
1320 Richland Street
Columbia, SC 29201
Attorney for the Petitioner

Jeff. C. Chandler
Chandler Law
Bank of America Building
2501 Oak Street
Myrtle Beach, SC 29578
Attorney for Petitioner



Leslie L. Leppert, Paralegal
Willson Jones Carter & Baxley, P.A.
4500 Fort Jackson Boulevard
Columbia, South Carolina 29209

October 17, 2017
Columbia, South Carolina