

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

RECEIVED

NOV 15 2017

SC Court of Appeals

Appellate Case No.: 2017-001535

Doretta Butler-Long, Employee, Claimant, Appellant,

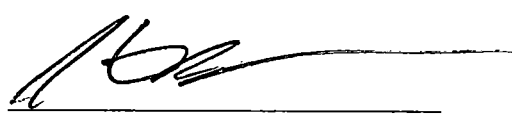
v.

ITW Labels, Employer and American Zurich Insurance
Company/Zurich North America c/o Broadspire, Carrier, Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL REPLY BRIEF**

Appellant, by and through his undersigned counsel, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Brief of Appellant and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on November 13, 2017. If the extension is granted, the Brief will be due on December 13, 2017. As grounds for this Motion, Appellant would show additional time is needed as the undersigned is a solo practitioner and the brief is not yet completed due to the press of work. Additionally, Counsel completed a 7-day trial on November 6th; has 9 workers' compensation hearings scheduled through December 13th; will be traveling to attend a Conference November 15 - 18; and traveling for the Thanksgiving holiday November 22 - 25, 2017.

Respectfully Submitted:



Stephen B. Samuels
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29250
(803) 779-4000

November 13, 2017



THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2017-001535

RECEIVED

NOV 15 2017

SC Court of Appeals

Doretta Butler-Long, Employee, Claimant, Appellant,

v.

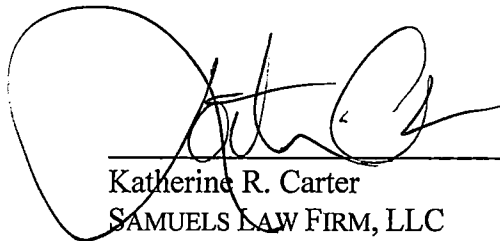
ITW Labels, Employer and American Zurich Insurance
Company/Zurich North America c/o Broadspire, Carrier, Respondents.

PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **Motion for Extension of Time to File Appellant's Initial Reply Brief** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on November 13, 2017, addressed as follows:

Jason W. Lockhart, Esquire
McAngus Goudelock & Courie, LLC
PO Box 12519
Columbia SC 29211

November 13, 2017



Katherine R. Carter
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000



STEPHEN B. SAMUELS
ATTORNEYS AT LAW

November 13, 2017

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RECEIVED

NOV 15 2017

RE: Doretta Butler-Long v. ITW Labels, et al.
Appellate Case No.: 2017-001535

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Motion for Extension of time to file Appellant's Initial Reply Brief and Proof of Service**, in the above case.

Please have your staff file the Motion for Extension and Proof of Service, then return a clocked copy in the enclosed self-addressed stamped envelope.

With kindest regards, I am

Respectfully,

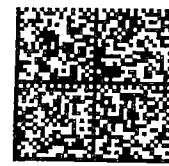
Katherine R. Carter
Litigation Paralegal


/krc
Enclosure(s) as stated

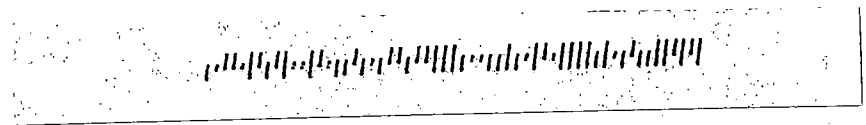
cc: Jason W. Lockhart, Esq.

WE WORK FOR THE PEOPLE WHO WORK.

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSLAWFIRM.NET



UNITED STATES POSTAGE

 PITNEY BOWES
 02 1P \$ 001.82⁰
 0001963503 NOV 13 2017
 MAILED FROM ZIP CODE 29201



1320 RICHLAND STREET
 COLUMBIA, SC 29201

RECEIVED

NOV 15 2017

SC Court of Appeals



The Honorable Jenny Abbott Kitchings
 Clerk of the South Carolina Court of Appeals
 1015 Sumter Street
 Columbia, South Carolina 29201