

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

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,

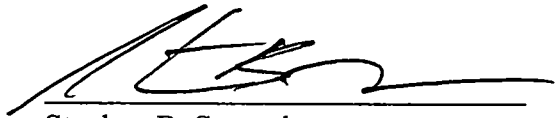
v.

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

MOTION FOR EXTENSION OF TIME TO FILE PETITIONER'S REPLY BRIEF

Petitioner, by and through his undersigned attorney, hereby moves this Honorable Court for a 20-day extension in which to file the Reply Brief of Petitioner. The Brief is currently due on November 30, 2017. If the extension is granted, the Brief will be due on December 20, 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 state for the Thanksgiving holiday, which fell during the briefing period. Additionally, Respondents' Brief is substantially different than the Respondents Brief at the Court of Appeals.

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November 29, 2017

ATTORNEYS FOR PETITIONER

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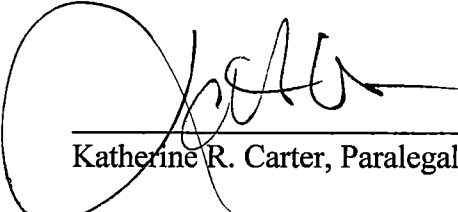
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PROOF OF SERVICE

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 Reply 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 November 29, 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

November 29, 2017
Columbia, South Carolina



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|||||
Honorable Daniel E. Shearouse
Clerk of Court, S.C. Supreme Court
P.O. Box 11330
Columbia, SC 29211