

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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DEC 12 2017
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2017-001535

Doretta Butler-Long, Employee, Claimant, Appellant,

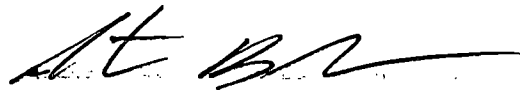
v.

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

**2nd 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 5-day extension in which to file the Initial Reply Brief of Appellant and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on December 13, 2017. If the extension is granted, the Brief will be due on December 18, 2017. As grounds for this Motion, Appellant would show additional time is needed as the undersigned is a solo practitioner who had been out of the town for 10 days during the briefing period and was delayed by the press of business with 5 workers' compensation hearings scheduled before the Christmas holiday.

Respectfully Submitted:



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

December 11, 2017



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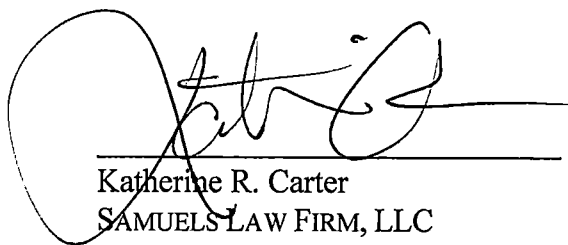
PROOF OF SERVICE

I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **2nd 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 December 11, 2017, addressed as follows:

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

Helen Hiser, Esquire
McAngus Goudelock & Courie, LLC
735 Johnnie Dodds Blvd. Ste 200
Mt. Pleasant, SC 29464

December 11, 2017



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



STEPHEN B. SAMUELS
ATTORNEYS AT LAW

December 11, 2017

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

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

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **2nd 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 2nd 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,

A handwritten signature in black ink, appearing to read "K. Carter", is written over the typed name and title.

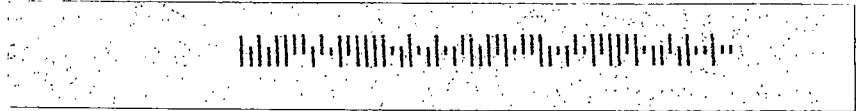
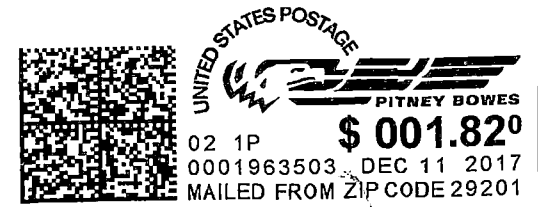
Katherine R. Carter
Litigation Paralegal

/krc
Enclosure(s) as stated

cc: Jason W. Lockhart, Esq.
Helen Heiser, 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



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