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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC File No. 1012533
Appellate Case No. 2017-001764

Chisholm Frampton, Appellant,

v.

S.C. Department of Natural Resources, Employer,
and S.C. State Accident Fund, Carrier, Respondents.


**MOTION FOR THE COURT TO ACCEPT THE
APPELLANT'S INITIAL REPLY BRIEF OUT OF TIME**

Pursuant to Rules 240 and 263(b), SCACR, Appellant hereby moves this Court to accept for filing out of time the initial reply brief. The initial reply brief was due to be filed on January 2, 2018. One extension of this deadline had been granted.

The initial reply brief is conditionally filed with this motion and served on all other parties.

Respectfully submitted,

January 4, 2018

 on behalf of and
with permission
Blake A. Hewitt # 73674
BLUESTEIN THOMPSON SULLIVAN, LLC
Post Office Box 7965
Columbia, South Carolina 29202
(803) 779-7599

Attorney for Appellant

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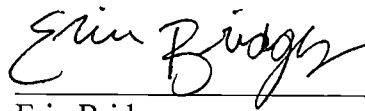
S.C. Department of Natural Resources, Employer,
and S.C. State Accident Fund, Carrier, Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Motion for the Court to Accept the Initial Reply Brief Out of Time* and the conditionally filed *Initial Reply Brief* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Kirsten L. Barr
Trask & Howell, LLC
PO Box 2167
Mt. Pleasant, SC 29465-2167

January 4, 2018


Erin Bridges

January 4, 2018

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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RE: Chisholm Frampton v. SCDNR
Case Tracking No.: 2017-001764

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for the Court to Accept the Initial Reply Brief Out of Time*. Also, please find enclosed the conditionally filed original and one (1) copy of the *Initial Reply Brief*. I have also enclosed a proof of service upon counsel for the Respondent and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges
Paralegal to Blake A. Hewitt
BLUESTEIN THOMPSON SULLIVAN, LLC

/emb

Enclosures

cc: John C. Land, III, Esquire
Kirsten L. Barr, Esquire