

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION  
APPELLATE PANEL

**RECEIVED**  
MAR 15 2018  
SC Court of Appeals

Appellate Case No. 2017-002124  
W.C.C. File No. 1501382

Edmund Dillon, Employee,.....Appellant,

v.

FleetPride, Employer, and Gallagher Bassett as TPA for  
American Zurich Insurance Company, Carrier,..... Respondents.

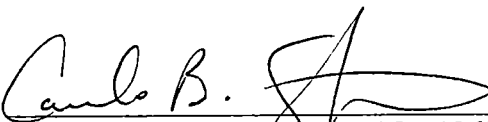
**RESPONDENTS' MOTION FOR EXTENSION OF TIME  
TO FILE THEIR INITIAL BRIEF AND DESIGNATION  
OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

Pursuant to Rule 240 of the South Carolina Rules of Appellate Practice, Respondents FleetPride and Gallagher Bassett as TPA for American Zurich Insurance Company (hereinafter "Respondents") hereby move this Court for an Order granting an extension of time during which to file their Initial Brief and Designation Of Matter To Be Included In The Record On Appeal. For the reasons set forth below, Respondents request an additional period of thirty days from March 19, 2018, during which to file these documents.

The additional time requested, beyond the extension of time previously granted by the Court, is warranted given the complexity of the legal issues presented. The thirty-day extension will not prejudice Respondents or Appellant or affect their legal rights.

Respondents intend to work diligently and to file their Initial Brief and Designation Of Matter as soon as practicable. However, for the reasons stated above, Respondents respectfully request that the Court grant a thirty-day extension of time during which they may file their Initial Brief and Designation Of Matter.

March 15, 2018

By:   
Cynthia C. Dooley (SC Bar No. 13623)  
Carmelo B. Sammataro (SC Bar No. 69746)  
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ATTORNEYS FOR RESPONDENTS

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American Zurich Insurance Company, Carrier,..... Respondents.

**PROOF OF SERVICE**

I certify this 15th day of March 2018 that I have served a copy of RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE THEIR INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL upon other counsel of record, by mailing same, postage prepaid in the United States mail, addressed to the following:

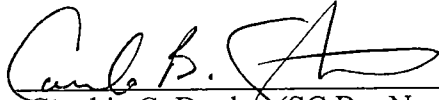
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Columbia, SC 29229

ATTORNEYS FOR APPELLANT

(Signature page to follow.)

March 15, 2018

By:   
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March 15, 2018

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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MAR 15 2018  
SC Court of Appeals

Re: Edmund Dillon, Employee, v. FleetPride, Employer, and Gallagher Bassett as  
TPA for American Zurich Insurance Company, Carrier  
Appellate Case No.: 2017-002124  
File No.: 426.1452

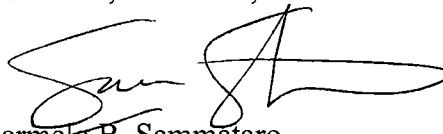
Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondents' Motion For Extension Of Time To File Their Initial Brief And Designation Of Matter To Be Included In The Record On Appeal regarding the above-referenced matter. Also enclosed are the original and one copy of the Proof of Service and our check for the filing fee. Please file the original filings and return clocked copies to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



Carmelo B. Sammataro

CBS/tj

Enclosures

cc: Preston F. McDaniel, Esquire  
Brian Dumas, Esquire  
(w/enc.)