

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA WORKERS'  
COMPENSATION COMMISSION APPELLATE PANEL

Susan S. Barden, Commissioner, Chair  
Aisha Taylor, Commissioner  
Avery B. Wilkerson, Jr., Commissioner

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APR 04 2018

SC Court of Appeals

Appellate Case No. 2017-002069  
W.C.C. File No. 1604067

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Courtney Forrest, .....Employee/Respondent,

v.

ADS Waste Holdings, Inc., ..... Employer, and

Arch Insurance Company, .....Carrier, Appellants.

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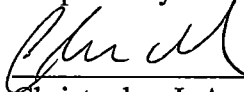
**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND  
DESIGNATION OF MATTER**

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Respondent, by and through his undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file his Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The Initial Brief of Respondent is currently due on April 6, 2018. If the extension is granted, the Initial Brief of Respondent will be due on May 6, 2018. This motion is based on the relative complexity of the issues on appeal that are involved in this case.

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Respectfully submitted,



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Christopher J. Archer, Esquire  
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2519 Devine Street, Suite A  
Columbia, SC 29205  
803-251-4517  
Attorney for Employee/Respondent  
SC Bar No.: 101662

Columbia, South Carolina  
April 4, 2018

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Courtney Forrest, ..... Employee/Respondent,

v.

ADS Waste Holdings, Inc., ..... Employer, and

Arch Insurance Company, ..... Carrier, Appellants.

Proof of Service

I certify that I have served a copy of the **Motion for Extension of Time to File Initial Brief and Designation of Matter** on R. Daniel Addison, Esquire and David M. Bornemann, Esquire, Counsel for the Appellants, at the address below by depositing a copy of same in the United States Mail, postage prepaid, on April 4, 2018.

R. Daniel Addison, Esquire  
David M. Bornemann, Esquire  
Hedrick Gardner Kincheloe & Garofalo LLP  
1301 Gervais Street, Suite 1900  
Columbia, SC 29201

- signature page to follow -

Respectfully submitted,



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Christopher J. Archer, Esquire  
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2519 Devine Street, Suite A  
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Attorney for Employee/Respondent  
SC Bar No.: 101662

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April 4, 2018

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April 4, 2018

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SC Court of Appeals

## VIA HAND DELIVERY

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

**RE: Courtney Forrest v. ADS Waste Holdings, Inc. and Arch Insurance Company**  
*WCC File No.: 1604067*  
*Appellate Case No.: 2017-002069*  
*DOI: April 12, 2016*  
*Our File No.: 7000-0140*

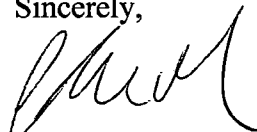
Dear Ms. Kitchings:

This letter is to request a 30 day extension of the deadline to file the Respondent's Initial Brief and Designation of Matter in the above referenced matter. The current due date for this filing is on April 6, 2018.

This is the first request for an extension by the Respondent for this filing. I have also enclosed a check in the amount of \$25.00 for the filing fee. Please return the additional clocked copy of this correspondence with my courier.

By copy of this letter to opposing counsel, I am notifying him of this request as well

Sincerely,



Christopher J. Archer

CJA  
Enclosures

cc: R. Daniel Addison, Esquire  
David M. Bornemann, Esquire