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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION  
Appellate Panel

**RECEIVED**  
APR 06 2018  
SC Court of Appeals

W.C.C. Nos. 1422259 & 1507127

Thomas Hebert, Employee/Claimant ..... Respondent,

v.

Drucker & Falk, L.L.C., Employer, and  
American Zurich Insurance Co./Zurich North America  
c/o Gallagher Basset Services, Inc. (Carrier as to  
WCC File No: 1507127), and Key Risk Management  
Services, Inc. (Carrier as to WCC File No: 1422259),.....Defendants,

Of which Drucker & Falk, L.L.C., Employer, and  
Key Risk Management Services, Inc., Carrier, are the .....Appellants.

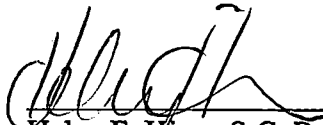
**JOINT MOTION FOR  
ADDITIONAL STAY OF APPEAL**

As explained in their Joint Motion for Stay of Appeal, filed March 15, 2018, Appellants Drucker & Falk, L.L.C. and Key Risk Management Services, Inc., and Respondents Thomas Hebert and American Zurich Insurance Co./Zurich North America c/o Gallagher Basset Services, Inc. have agreed to mediate the issues raised in this appeal, in hopes of reaching a global settlement of this case. Appellants and Respondents jointly moved this Court to hold this appeal in abeyance for 60 days pending mediation. In an Order dated March 20, 2018, this Court granted a 60-day stay of the appeal.

However, mediation has been scheduled for June 13, 2018, which is the earliest date that worked for the mediator and all of the parties. Therefore, the parties jointly request a further stay of this appeal until July 30, 2018 in order to provide them time to mediate this claim and, should a settlement be reached, finalize the settlement and file with the Workers' Compensation Commission.

This motion conforms with Rule 240 and Rule 267, SCACR.

April 4, 2018



Helen F. Hiser, S.C. Bar No.: 76124  
MCANGUS GOUDELOCK & COURIE, LLC  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Appellants Drucker & Falk, L.L.C. and  
Key Risk Management Services, Inc.*



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THE STEINBERG LAW FIRM  
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Goose Creek, South Carolina 29445

*Attorneys for Respondent Thomas Hebert*



Vincent C. Northcutt, S.C. Bar No.: 71763  
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503 Wando Park Boulevard, Suite 205  
Mt. Pleasant, South Carolina 29464

*Attorneys for Drucker & Falk, L.L.C. and  
Respondent American Zurich Insurance Co./  
Zurich North America c/o Gallagher Basset Services, Inc.*

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c/o Gallagher Basset Services, Inc. (Carrier as to  
WCC File No: 1507127), and Key Risk Management  
Services, Inc. (Carrier as to WCC File No: 1422259), ..... Defendants,

Of whom Drucker & Falk, L.L.C. Employer, and  
Key Risk Management Services, Inc. are the ..... Appellants.

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**PROOF OF SERVICE**

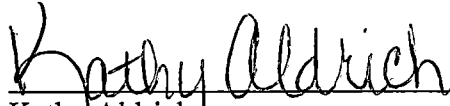
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I certify that I have served the **Joint Motion for Additional Stay of Appeal** on the attorney of record for Respondent Thomas Hebert and the attorney of record for Respondent American Zurich Insurance Co./Zurich North America c/o Gallagher Basset Services, Inc. by depositing a copy of it in the United States Mail, postage prepaid, on the 4th day of April, 2018, addressed as follows:

Thomas M. White, Esquire  
The Steinberg Law Firm  
Post Office Box 1028  
Goose Creek, South Carolina 29445  
*Attorneys for Respondent Thomas Hebert*

Vincent C. Northcutt, Esquire  
Lueder, Larkin & Hunter, LLC  
503 Wando Park Boulevard, Suite 205  
Mt. Pleasant, South Carolina 29464

*Attorneys for Drucker & Falk, L.L.C. and  
Respondent American Zurich Insurance Co./  
Zurich North America c/o Gallagher Basset Services, Inc.*

A handwritten signature in black ink that reads "Kathy Aldrich". The signature is written in a cursive style and is positioned above a horizontal line.

Kathy Aldrich

Assistant to Helen F. Hiser

MCANGUS GOUDELOCK & COURIE LLC

P.O. Box 650007

Mount Pleasant, South Carolina 29465

(843) 576-2900

*Attorneys for Appellants Drucker & Falk, L.L.C.  
and Key Risk Management Services, Inc.*

**mgc**

**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

April 4, 2018

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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SC Court of Appeals

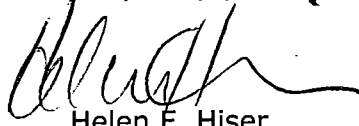
RE: Thomas Hebert v. Drucker & Falk, LLC and Key Risk Insurance Company  
of SC c/o Key Risk Management Services, Inc.  
Date of Accident: December 8, 2014  
WCC File No.: 1422259  
Our File No.: 2016.15038  
Claim No.: 15018596  
Appeal No.: 2018-000325

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the parties' Joint Motion for Additional Stay of Appeal, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the enclosed self-addressed, stamped envelope. Also enclosed is our firm's check in the amount of \$25 for filing the motion.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Helen F. Hiser

Enclosure

cc: Thomas M. White, Esq.  
Vincent C. Northcutt, Esq.



**mgc**

POST OFFICE BOX 650007  
MOUNT PLEASANT, SC 29465

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SC Court of Appeals

**2016.15038/HFH/kea**  
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

