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**NOV 16 2017**

**S.C. SUPREME COURT**

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

The Honorable W. Jeffrey Young, Circuit Court Judge

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Appellate Case No. 2017-001956

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Arrowpoint Capital Corporation/Arrowood Indemnity Co., ..... Respondent,

v.

South Carolina Second Injury Fund, ..... Petitioner.

[In re: Joe Mathis, Employee/Claimant v. Yuasa Exide, Incorporated, Employer]

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**MOTION TO EXTEND TIME TO FILE  
RETURN TO MOTION TO DISMISS**

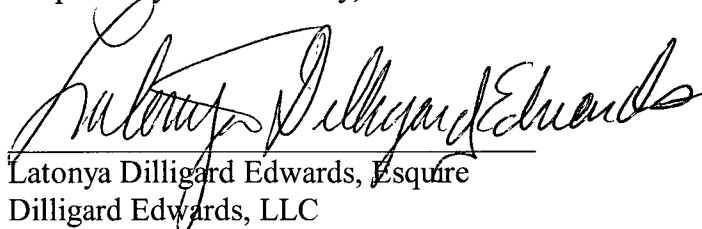
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Petitioner, South Carolina Second Injury Fund, by and through the undersigned counsel, moves this Court to extend the time for the filing of its Return to Motion to Dismiss, which was due on Monday, November 6, 2017 based on the following grounds:

1. Petitioner received Respondent's Motion to Dismiss on October 26, 2017, while Petitioner was at home tending to her two (2) children, both of whom had contracted a case of hand, foot and mouth disease.
2. Petitioner missed several days of work and was unable to timely prepare the Return to Respondent's Motion to Dismiss.

Based on the information herein, Petitioner requests that the time for filing its Return to Respondent's Motion to Dismiss be due on or before Friday, November 17, 2017. Granting this motion will not cause prejudice to any party.

Respectfully Submitted By,

A handwritten signature in black ink, reading "Latonya Dilligard Edwards". The signature is written in a cursive style and is positioned above a horizontal line.

Latonya Dilligard Edwards, Esquire  
Dilligard Edwards, LLC  
3790 Fernandina Road, Suite 103  
Columbia, South Carolina 29210  
S.C. Bar#: 14593  
(803) 750-2214 (telephone)  
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ATTORNEY FOR PETITIONER

Columbia, South Carolina  
November 16, 2017

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**PROOF OF SERVICE**

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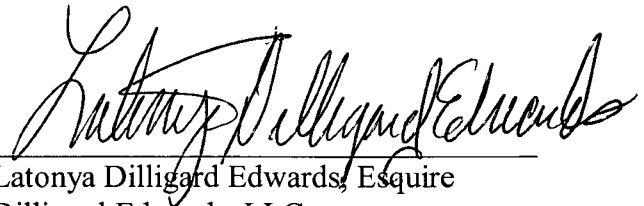
Petitioner, South Carolina Second Injury Fund, by and through its undersigned counsel, does hereby certify that service of the **RETURN TO MOTION TO DISMISS AND MOTION TO EXTEND TIME TO FILE RETURN TO MOTION TO DISMISS** to The South Carolina Supreme in the above-captioned matter was made upon counsel of record for Respondent, Arrowpoint Capital Corporation/Arrowood Indemnity Co., and the South Carolina Workers' Compensation Commission, by placing same in the United States mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelope on this 16<sup>th</sup> day of November, 2017, as follows:

Vernon F. Dunbar, Esquire  
McAngus Goudelock & Courie, LLC  
Post Office Box 2980  
Greenville, South Carolina 29602

Ashley R. Forbes, Esquire  
Attorney at Law  
5 Britton Way  
Greenville, South Carolina 29615

The Honorable Amy Bracy, Judicial Director  
South Carolina Workers' Compensation Commission  
Post Office Box 1715  
Columbia, South Carolina 29202-1715

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



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