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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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AUG 15 2018
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2018-000965

Victor G. Benjamin, Employee, Appellant,

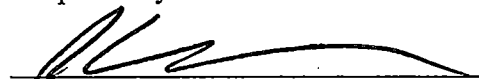
v.

Rexam Beverage Can Company d/b/a Rexam Beverages, Employer, and
Hartford Insurance Company of the Midwest c/o Sedgwick CMS, Carrier, Respondents.

**SECOND MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

Respondent, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on August 13, 2018. If the extension is granted, the Brief will be due on September 12, 2018. As grounds for this Motion, Appellant would show additional time is needed as this case involves multiple complex legal issues and a large record with over 1,000 pages of medical records, plus hearing and deposition transcripts. Additionally, the undersigned is a solo practitioner and the brief is not yet completed due to the press of work.

Respectfully Submitted:



Stephen B. Samuels
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1320 Richland Street
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August 13, 2018
Columbia, South Carolina

Counsel for the Respondent

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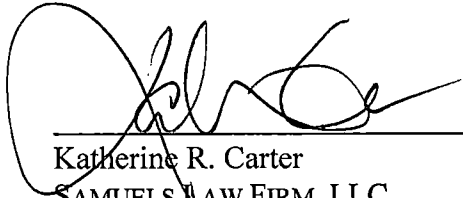
Rexam Beverage Can Company d/b/a Rexam Beverages, Employer, and
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PROOF OF SERVICE

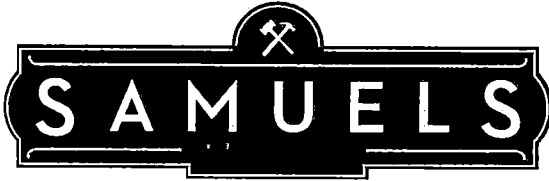
I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **Second Motion for Extension of Time to File Appellant's Initial Reply Brief and Designation of Matter** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on August 13, 2018, addressed as follows:

Jason W. Lockhart, Esq.
McAngus Goudelock & Courie, LLC
P.O. Box 12519
Columbia, SC 29211

August 13, 2018



Katherine R. Carter
SAMUELS LAW FIRM, LLC
1320 Richland Street
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(803) 779-4000



STEPHEN B. SAMUELS
ATTORNEYS AT LAW

August 13, 2018

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

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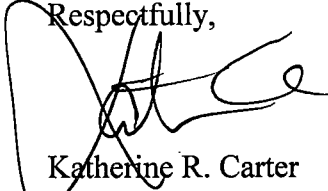
RE: Victor G. Benjamin v. Rexam Beverage Can Company, et al.
Appellate Case No.: 2018-000965

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Second Motion for Extension of time to file Appellant's Initial Reply Brief and Designation of Matter and Proof of Service**, in the above case.

Please have your staff file the Motion for Extension and Proof of Service, then return a clocked copy in the enclosed self-addressed stamped envelope.

With kindest regards, I am

Respectfully,

Katherine R. Carter
Litigation Paralegal

/krc
Enclosure(s) as stated

cc: Jason W. Lockhart, Esq.

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