

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
South Carolina Workers' Compensation Commission

R. Michael Campbell, Commissioner; T. Scott Beck, Commissioner; Susan S. Barden,  
Commissioner

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W.C.C. File No.: 1401730  
Appellate Case No.: 2018-001553

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**RECEIVED**  
NOV 27 2018  
SC Court of Appeals

Carl E. Lucas, Employee, Respondent,

v.

RNDC of South Carolina, Employer, and Hartford Indemnity, Carrier, Appellants.

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**MOTION TO FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF  
MATTER OUT OF TIME**

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To: The Honorable Judges of The South Carolina Court of Appeals

Respondent, Carl E. Lucas, respectfully moves this Court for an Order granting leave to file the Respondents' Initial Brief and Designation of Matter out of Time due November 28, 2018.

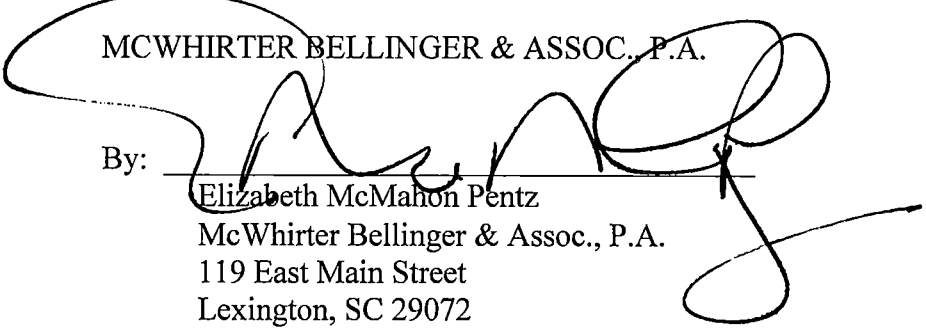
Counsel for Respondent requests a five (5) day extension until Monday, December 3, 2018, to properly respond to Appellant's Initial Brief.

**[SIGNATURE PAGE FOLLOWS}**

Respectfully submitted,

MCWHIRTER BELLINGER & ASSOC., P.A.

By:

  
Elizabeth McMahon Pentz

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Attorney for Respondent, Carl E. Lucas

**MOTION TO FILE RESPONDENTS' INITIAL  
BRIEF AND DESIGNATION OF MATTER  
OUT OF TIME**

Lexington, South Carolina  
November 27, 2018

THE STATE OF SOUTH CAROLINA  
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**PROOF OF SERVICE**

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Counsel for the Respondent certifies that she served Respondent's Motion to File Respondent's Initial Brief and Designation of Matter out of Time on the Appellants by depositing a copy of the same into the United States Postal Service with sufficient postage affixed on November 27, 2018, addressed to the following attorney of record:

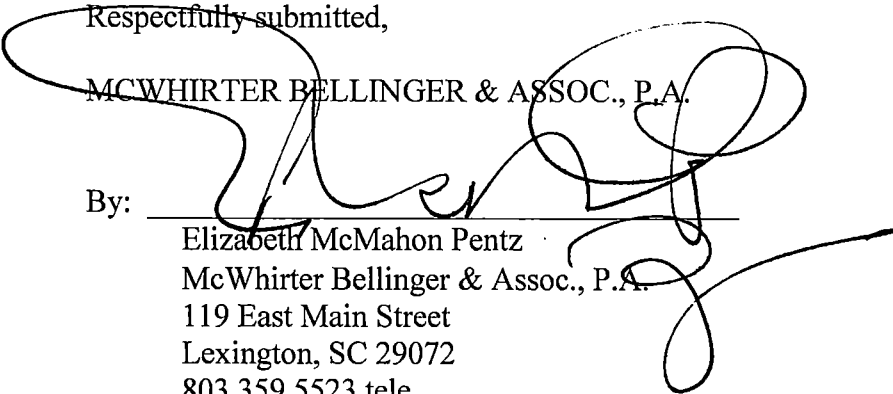
**[SIGNATURE PAGE FOLLOWS]**

Kay G. Crowe, Esquire  
Barnes, Alford, Stork & Johnson, LLP  
PO Box 8448  
Columbia, South Carolina 29202  
Attorney for Appellants, RNDC of South Carolina and Hartford Indemnity

Respectfully submitted,

MCWHIRTER BELLINGER & ASSOC., P.A.

By: \_\_\_\_\_



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Attorney for Respondent, Carl E. Lucas

**PROOF OF SERVICE**

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CHRISTOPHER M. CUNNINGHAM  
MADELYN E. DUKES  
ASHLEIGH ANNE MCKINNEY

November 27, 2018

**VIA HAND DELIVERY:**

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

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NOV 27 2018  
SC Court of Appeals

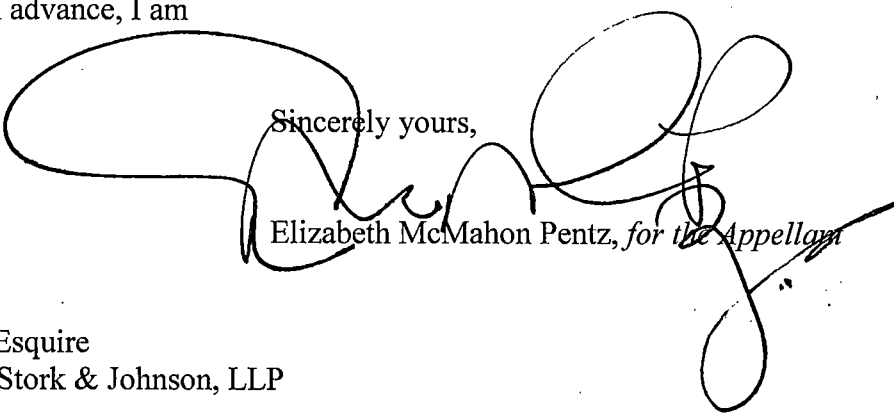
RE: Carl E. Lucas, Employee, Respondent, v. RNDC of South Carolina, Employer,  
and Hartford Indemnity, Carrier, Appellants.  
Appellate Case No.: 2018-001553

Dear Ms. Kitchings:

Enclosed please find the Respondent's Motion to File the Respondent's Initial Brief and Designation of Matter out of Time along with Proof of Service copied to opposing counsel. Further, four (4) additional copies are included for clocking and return to our office.

Thanking you in advance, I am

Sincerely yours,

  
Elizabeth McMahon Pentz, for the Appellants

cc: Kay G. Crowe, Esquire  
Barnes, Alford, Stork & Johnson, LLP  
PO Box 8448  
Columbia, South Carolina 29202  
Attorney for Appellants, RNDC of South Carolina and Hartford Indemnity