

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
JAN 15 2019  
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No.: 2018-001249

Sarah Folston, Claimant, ..... Appellant,

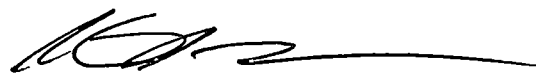
v.

South Carolina Department of Disabilities and Special Needs, Employer, and  
SC State Accident Fund, Carrier, ..... Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE  
APPELLANT'S INITIAL REPLY BRIEF**

Appellant, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Reply Brief. The Brief is currently due on January 14, 2019. If the extension is granted, the Brief will be due on January 28, 2019. As grounds for this Motion, Appellant would show additional time is needed as the brief is not yet completed due to the press of work.

Respectfully Submitted:



Stephen B. Samuels  
Samuels Law Firm, LLC  
1320 Richland Street  
Columbia, SC 29250  
(803) 779-4000

January 14, 2019  
Columbia, South Carolina

Counsel for the Appellant

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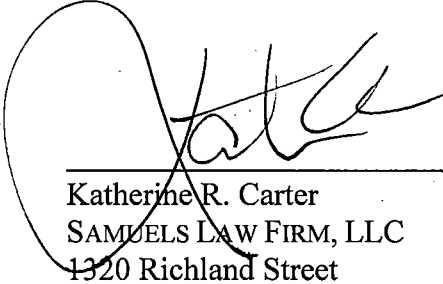
South Carolina Department of Disabilities and Special Needs, Employer, and  
SC State Accident Fund, Carrier, ..... Respondents.

**PROOF OF SERVICE**

I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **Motion for Extension of Time to File Appellant's Initial Reply Brief** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on January 14, 2019, addressed as follows:

Erin Farthing, Esq.  
SC State Accident Fund  
Post Office Box 102100  
Columbia, SC 29221

January 14, 2019



Katherine R. Carter  
SAMUELS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

January 14, 2019

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JAN 15 2019

**SC Court of Appeals**

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

RE: Sarah Folston v. SC Department of Disabilities and Special Needs, et. al.  
Appellate Case No.: 2018-001249

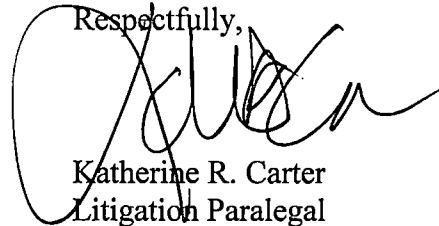
Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Motion for Extension of time to file Appellant's Initial Reply Brief 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: Erin Farthing, Esquire

WE WORK FOR THE PEOPLE WHO WORK.

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COLUMBIA, SC 29201

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**SC Court of Appeals**



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