

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC File No. 1115485
Appellate Case No. 2018-001197

RECEIVED
MAR 22 2019
SC Court of Appeals

Lamar Clark, Appellant,

v.

Philips Electronics/Shakespeare, Employer,
and Gallagher Bassett Services, Carrier, Respondents.

**MOTION FOR THE COURT TO ACCEPT THE
APPELLANT'S INITIAL REPLY BRIEF OUT OF TIME**

Pursuant to Rules 240 and 263(b), SCACR, Appellant hereby moves this Court to accept for filing out of time the initial reply brief and designation of matter. The initial reply brief was due to be filed yesterday, March 21, 2019. One extension of this deadline has been granted.

The initial reply brief and designation of matter are conditionally filed with this motion and served on all other parties.

Respectfully submitted,

Blake A. Hewitt on behalf and with permission

Blake A. Hewitt # 73674
BLUESTEIN THOMPSON SULLIVAN, LLC
Post Office Box 7965
Columbia, South Carolina 29202
(803) 779-7599
blake@bluesteinattorneys.com

March 22, 2019

William B. Salley, Jr. # 15253
SALLEY LAW FIRM, P.A.

Attorneys for Appellant

89350

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC File No. 1115485
Appellate Case No. 2018-001197

RECEIVED
MAR 22 2019
SC Court of Appeals

Lamar Clark, Appellant,

v.

Philips Electronics/Shakespeare, Employer,
and Gallagher Bassett Services, Carrier, Respondents.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Motion for the Court to Accept the Initial Brief Out of Time, Initial Reply Brief, and Designation of Matter to be Included in the Record on Appeal* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Brooke A. Payne
LUEDER, LARKIN & HUNTER
PO Box 2449
Mt. Pleasant, SC 29465



Erin Bridges

March 22, 2019

March 22, 2019

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
MAR 22 2019
SC Court of Appeals

RE: Lamar Clark v. Philips Electronics/Shakespeare
Case Tracking No.: 2018-001197

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for the Court to Accept the Initial Reply Brief Out of Time*. Also, please find enclosed the conditionally filed original and one (1) copy of the *Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal*. I have also enclosed a proof of service upon counsel for the Respondents and a check in the amount of \$50.00 for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges
Paralegal to Blake A. Hewitt
Bluestein Thompson Sullivan, LLC

/emb

Enclosures

cc: William B. Salley, Jr., Esquire
Brooke A. Payne, Esquire