

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Robin B. Stilwell, Circuit Court Judge

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Appellate Case No. 2019-000020  
Case No. 2018-CP-23-2580

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

South Carolina Property and Casualty  
Insurance Guaranty Association,..... Respondent,

v.

Second Injury Fund Operations of the South Carolina Insurance  
Reserve Fund f/k/a South Carolina Second Injury Fund, ..... Appellant,

In Re:

Michael Quarles..... Employee/Claimant,

v.

Cryovac Sealed Air Corporation, ..... Employer,

and

Lumbermens Mutual Casualty Company in Liquidation/South Carolina  
Property and Casualty Insurance Guaranty Association, ..... Carrier/Defendant.

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**MOTION FOR EXTENSION OF TIME TO  
FILE INITIAL BRIEF OF APPELLANT**

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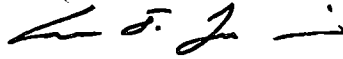
The Appellant Second Injury Fund Operations of the South Carolina Insurance Reserve Fund f/k/a South Carolina Second Injury Fund respectfully moves this Court for an additional fifteen-day extension of time until June 4, 2019, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant's motion is based on the following grounds:

1. The Appellant's Initial Brief is currently due to be filed and served on May 20, 2019.
2. The undersigned counsel for the Appellant requires this additional time to complete the preparation and drafting of the Appellant's Initial Brief because of other obligations and deadlines, including other appellate briefs due, motion hearings, and preparation for a day certain trial to begin May 28, 2019.
3. Counsel for the Respondent South Carolina Property and Casualty Insurance Guaranty Association has been consulted and has consented to the requested extension through June 4, 2019. (See attached email).

WHEREFORE, the Appellant Second Injury Fund Operations of the South Carolina Insurance Reserve Fund f/k/a South Carolina Second Injury Fund respectfully requests that it be allowed until June 4, 2019, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN, DAVIS & HUGHES, P.A.



BY: s/ Andrew F. Lindemann

ANDREW F. LINDEMANN #13030  
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-and-

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*Counsel for Appellant Second Injury Fund  
Operations of the South Carolina Insurance  
Reserve Fund f/k/a South Carolina Second  
Injury Fund*

May 15, 2019

## Andrew Lindemann

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**From:** Hubert Wood <hubie@woodgroupllc.com>  
**Sent:** Wednesday, May 15, 2019 9:52 AM  
**To:** Andrew Lindemann  
**Cc:** Robert Cook; Matt Fultz  
**Subject:** Re: Guaranty Assoc v. Second Injury Fund

Certainly- no problem.  
HW

Sent from my iPad

On May 15, 2019, at 9:50 AM, Andrew Lindemann <[Andrew@LDH-Law.com](mailto:Andrew@LDH-Law.com)> wrote:

Hubie:

I have a favor to ask. I have just been slammed lately and have a date certain trial at the end of the month. Would you kindly consent to an extension of an additional 15 days for us to file our Initial Brief in this appeal. I'd like to get the motion filed in the next day if possible. Thanks.

Andrew

THE STATE OF SOUTH CAROLINA  
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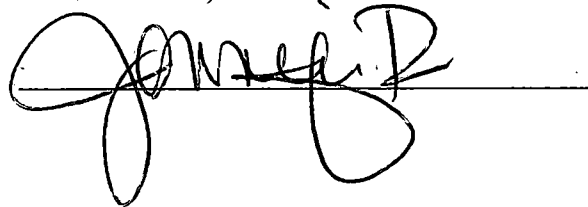
**CERTIFICATE OF SERVICE**

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The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Appellant, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Appellant** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelope this the 15th day of May 2019:

J. Hubert Wood, III, Esquire  
Wood Law Group, LLC  
Post Office Box 20550  
Charleston, South Carolina 29413

Robert M. Cook, II, Esquire  
The Robert Cook Law Firm, LLC  
Post Office Box 3575  
Leesville, South Carolina 29070

A handwritten signature in black ink, appearing to read "Robert M. Cook, II", is written over a horizontal line. The signature is stylized and cursive.



**LINDEMANN  
DAVIS &  
HUGHES**

Telephone (803) 881-8920  
Facsimile (803) 862-1181

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**JAMES M. DAVIS, JR.†**  
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**JOEL S. HUGHES†**  
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\*Also Admitted in North Carolina  
†Certified Mediator

*Of Counsel*

**STEVEN R. SPREEUWERS**  
Direct Dial: (803) 373-2268  
Email: [steve@ldh-law.com](mailto:steve@ldh-law.com)

May 15, 2019

**RECEIVED**

MAY 15 2019

SC Court of Appeals

**Hand Delivered**

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

RE: South Carolina Property and Casualty Insurance Guaranty Fund v. Second Injury Fund  
Operations of the South Carolina Insurance Reserve Fund f/k/a South Carolina Second  
Injury Fund  
Civil Action Number: 2018-CP-23-2580  
Our File Number: 104.10063

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension of Time to File Initial Brief of Appellant** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my assistant. I have not enclosed a filing fee because the Appellant is an entity of the State of South Carolina. By copy of this letter, I am serving copies on all counsel of record.

If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosures

The Honorable Jenny Abbott Kitchings  
May 15, 2019  
Page Two

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cc: J. Hubert Wood, III, Esquire  
Wood Law Group, LLC  
Post Office Box 20550  
Charleston, South Carolina 29413

Robert M. Cook, II, Esquire  
The Robert Cook Law Firm, LLC  
Post Office Box 3575  
Leesville, South Carolina 29070