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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No.: 2019-000556

**RECEIVED**  
MAY 20 2019  
SC Court of Appeals

Isaac D. Brailey, Claimant, ..... Appellant,

v.

Michelin North America, Inc., (US7), Employer,  
and Safety National Casualty Corp., Carrier, ..... Respondents.

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

Appellant, 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 Appellant and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on May 31, 2019. If the extension is granted, the Brief will be due on July 1, 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; counsel has two other appellate briefs due (May 24, 2019 Supreme Court) and (June 5, 2019 Court of Appeals); and counsel will be out of the state from May 25 - June 2, 2019.

Respectfully Submitted:



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

May 17, 2019  
Columbia, South Carolina

Counsel for the Appellant

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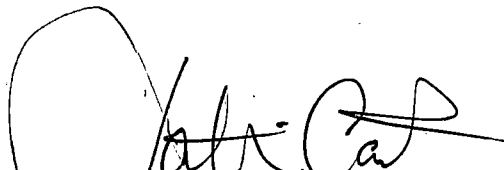
Michelin North America, Inc., (US7), Employer,  
and Safety National Casualty Corp., Carrier, ..... Respondents.

**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 Brief and Designation of Matter** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on May 17, 2019, addressed as follows:

Grady L. Beard, Esq.  
Robinson Gray Stepp & Laffitte, LLC  
P.O. Box 11449  
Columbia, SC 29211

May 17, 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

May 17, 2019

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

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RE: Isaac Brailey v. Michelin North America, Inc., et. al.  
Appellate Case No.: 2019-000556

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 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 the extra clocked copy in the enclosed self-addressed stamped envelope.

With kindest regards, I am

Respectfully,

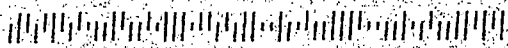
Katherine R. Carter  
Paralegal to Stephen B. Samuels

/krc

cc: Grady Beard, Esq.

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1320 RICHLAND STREET  
COLUMBIA, SC 29201



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