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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No.: 2019-000560

**RECEIVED**

JUN 05 2019

SC Court of Appeals

Gena Cain Davis, Claimant, ..... Appellant,


v.

S.C. Department of Corrections, Employer,  
and State Accident Fund, Carrier, ..... Respondents.

**SECOND 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 June 5, 2019. If the extension is granted, the Brief will be due on July 5, 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 and counsel was out of the state during the briefing period, between May 25 - June 2, 2019.

Respectfully Submitted:



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

June 5, 2019  
Columbia, South Carolina

Counsel for the Respondent

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

I certify that I, Katherine R. Carter, paralegal for the Samuels Law Firm, LLC, have served the **Second 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 June 5, 2019, addressed as follows:

Kirsten L. Barr, Esquire  
Trask & Howell, LLC  
Post Office Box 2167  
Mt. Pleasant, SC 29465

June 5, 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

June 5, 2019

*Via Hand Delivery*

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

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JUN 05 2019  
SC Court of Appeals

RE: Gena Cain-Davis v. SC Dept. Of Corrections and SAF  
Appellate Case No.: 2019-000560

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Second 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, and return the clocked copy with our courier.

With kindest regards, I am

Respectfully,

Katherine R. Carter  
Paralegal for Stephen B. Samuels

/krc

Enclosure(s) as stated

cc: Kirsten Barr, Esquire

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