

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

Appellate Case No. 2019-000020

Case No. 2018-CP-23-2580

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.

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

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JUN 21 2019
SC Court of Appeals

Respondent, by and through its undersigned attorney, hereby moves this Honorable Court for a thirty (30) day extension in which to file the Initial Respondent's Brief and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on July 3, 2019. If the extension is granted, the Respondent's Brief will be due on August 2, 2019. As grounds for this Motion, Respondent would show additional time is necessary as the undersigned did not receive the Initial Appellant's Brief and Designation of Matter served June 4, 2019 until June 10, 2019 and was out of the country on a planned family vacation from June 12, 2019 thru June 16, 2019. In addition, the undersigned is the Managing Member of a small law firm and has several other obligations, matters and deadlines currently pending before the South Carolina Workers' Compensation Commission, the United States Department of Labor Offices of Administrative Law Judges and Workers Compensation Programs, and Courts of the State of South Carolina. Please note that the Respondent has not requested any prior extensions for this Brief.



J. Hubert Wood, III, Esquire
Attorney for Respondent South Carolina
Property and Casualty Insurance
Guaranty Association

Charleston, South Carolina
June 19, 2019

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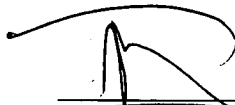
CERTIFICATE OF SERVICE

I, the undersigned attorney for the Respondent, due hereby certify that I have served one (1) copy of the Respondent's **MOTION FOR EXTENSION OF TIME TO FILE INITIAL RESPONDENT'S BRIEF AND DESIGNATION OF MATTER**, dated June 19, 2019, via first class mail, and addressed to the Appellant, c/o its attorneys as indicated below:

Andrew F. Lindemann, Esquire
P.O. Box 6923
Columbia, SC 29260

Robert M. Cook, II, Esquire
P.O. Box 3575
Leesville, SC 29070

Attorneys for Appellant



J. Hubert Wood, III, Esquire
Attorney for Respondent South Carolina
Property and Casualty
Insurance Guaranty Association

WOOD LAW GROUP, LLC
A T T O R N E Y S A T L A W
O N E W E S L E Y D R I V E
C H A R L E S T O N , S O U T H C A R O L I N A 2 9 4 0 7
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J. HUBERT WOOD, III

KATHRYN F. WALTON*
MATTHEW J. FULTZ†

REPLY TO
P.O. Box 20550
CHARLESTON, SOUTH CAROLINA 29413

June 19, 2019

*MEDICARE SET-ASIDE CERTIFIED CONSULTANT
†S.C. CERTIFIED MEDIATOR

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

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RE: South Carolina Property and Casualty Insurance Guaranty Association
v. Second Injury Fund Operations of the South Carolina Insurance
Reserve Fund f/k/a South Carolina Second Injury Fund
Appellate Case Number: 2019-000020
Civil Action No.: 2018-CP-23-2580
Our File No.: 45.124

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of Respondent's Motion for Extension of Time to File Initial Respondent's Brief and Designation of Matter for filing in the above referenced case. Enclosed please also find the \$50.00 filing fee check. I would appreciate you please directing the Motion for consideration at your earliest convenience. Thank you very much for your consideration of this request. Please contact me with questions or concerns.

Very truly yours,



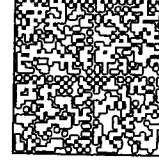
J. Hubert Wood, III

JHWIII/cb

Enclosures

cc: Mr. Randy Mason (via email only) (w/enc.)
J. Smith Harrison (via email only) (w/enc.)
Howard Van Dine, Esquire (via email only) (w/enc.)
Andrew F. Lindemann, Esquire (w/enc.)
Robert M. Cook, II, Esquire (w/enc.)

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