

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No.: 2019-000556

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

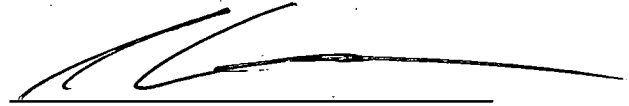
v.

Michelin North America, Inc., (US7), Employer,  
and Safety National Casualty Corp., 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 July 1, 2019. If the extension is granted, the Brief will be due on July 31, 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 had another appellate brief due (June 3, 2019 Supreme Court); and has an additional appellate brief due (July 5, 2019 Court of Appeals).

Respectfully Submitted:



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

July 1, 2019  
Columbia, South Carolina

Counsel for the Appellant

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
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Workers' Compensation Commission

Appellate Case No.: 2019-000556

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

v.

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 **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 July 1, 2019, addressed as follows:

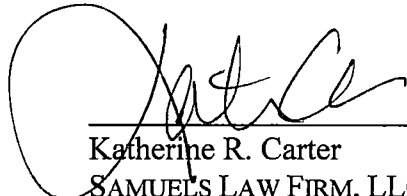
Grady L. Beard, Esq.  
Robinson Gray Stepp & Laffitte, LLC  
P.O. Box 11449  
Columbia, SC 29211

**RECEIVED**

JUL 01 2019

SC Court of Appeals

July 1, 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

July 1, 2019

*Via Hand Delivery*

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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JUL 01 2019  
SC Court of Appeals

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 **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, then return the extra clocked copy with our courier.

With kindest regards, I am

Respectfully,

A handwritten signature in black ink, appearing to read "K. Carter", is written over the typed name.

Katherine R. Carter  
Paralegal to Stephen B. Samuels

/krc

cc: Grady Beard, Esq.

WE WORK FOR THE PEOPLE WHO WORK.