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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No. 2016-002266

**RECEIVED**  
JUL 01 2019  
SC Court of Appeals

Renee Robles, Employee, Claimant, .....Appellant,

v.

Party Reflections, Inc., Employer, and  
Employers Assurance Company, Carrier, ..... Respondents,

**RESPONDENT'S FIRST MOTION  
FOR EXTENSION OF TIME TO FILE  
RESPONDENT'S RETURN TO APPELLANT'S MOTION  
FOR COSTS AND ATTORNEYS' FEES**

TO THE HONORABLE JUDGES OF THE SOUTH CAROLINA  
COURT OF APPEALS:

Pursuant to Rule 263(b), SCACR, Respondents Party Reflections, Inc.  
and Employers Assurance Company ("Respondents") respectfully moves this  
Court for a ten (10) day extension of time to file Respondent's Return to

Appellant's Motion for Costs and Attorneys' Fees. Respondent's Return is due Monday, July 1, 2019.

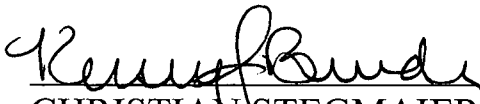
The grounds for this request are that undersigned counsel did not receive a copy of Appellant's Motion for Costs and Attorneys' Fees until June 26, 2019, and counsel is out of state at an industry conference from June 26 through June 28, 2019, and needs additional time to address Appellant's Motion. With the ten (10) day extension, Respondent's Reply would be due July 11, 2019.

This is Counsel's first request for an extension of time to file Respondent's Return to Appellant's Motion for Costs and Attorneys' Fees. Respondent greatly appreciates the Court's time, attention, and assistance with regard to this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By:   
CHRISTIAN STEGMAIER  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
ASHLEY R. KIRKHAM  
[akirkham@collinsandlacy.com](mailto:akirkham@collinsandlacy.com)  
KELSEY J. BRUDVIG  
[kbrudvig@collinsandlacy.com](mailto:kbrudvig@collinsandlacy.com)  
1330 Lady Street, Suite 601  
Post Office Box 12487  
Columbia, South Carolina 29211  
(803) 256-2660 (voice)  
(803) 771-4484 (facsimile)

ATTORNEYS FOR RESPONDENTS

**RESPONDENT'S FIRST MOTION  
FOR EXTENSION OF TIME TO  
FILE RESPONDENT'S RETURN TO  
APPELLANT'S MOTION FOR  
COSTS AND ATTORNEYS' FEES**

Columbia, South Carolina  
July 1, 2019

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Renee Robles, Employee, Claimant, .....Appellant,

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**PROOF OF SERVICE**

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I hereby certify that I served **RESPONDENT'S FIRST MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S RETURN TO APPELLANT'S MOTION FOR COSTS AND ATTORNEYS' FEES** upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on July 1, 2019, addressed to the following:


**COUNSEL SERVED:**

Stephen B. Samuels, Esquire  
Samuels Law Firm, LLC  
1320 Richland Street  
Columbia, SC 29201  
**COUNSEL FOR APPELLANT**

Mark R. Calhoun, Esquire  
Calhoun Law Firm  
714 East Main Street  
Lexington, SC 29072  
**COUNSEL FOR APPELLANT**

Respectfully submitted,

COLLINS & LACY, P.C.

By:   
CHRISTIAN STEGMAIER  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
ASHLEY R. KIRKHAM  
[akirkham@collinsandlacy.com](mailto:akirkham@collinsandlacy.com)  
KELSEY J. BRUDVIG  
[kbrudvig@collinsandlacy.com](mailto:kbrudvig@collinsandlacy.com)  
1330 Lady Street, Suite 601  
Post Office Box 12487  
Columbia, South Carolina 29211  
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ATTORNEYS FOR RESPONDENTS

**PROOF OF SERVICE -  
RESPONDENT'S FIRST MOTION  
FOR EXTENSION OF TIME TO  
FILE RESPONDENT'S RETURN TO  
APPELLANT'S MOTION  
FOR COSTS AND ATTORNEYS'  
FEES**

Columbia, South Carolina  
July 1, 2019



Kelsey J. Brudvig | D: 803.255.0418 | E: kbrudvig@collinsandlacy.com

July 1, 2019

**VIA HAND DELIVERY**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**Re: *Robles v. Party Reflections, Inc.***  
***Appellate Case No. 2016-002266***  
***C&L File No. 001655-00857***

Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of Respondent's First Motion for Extension of Time to file Respondents' Return to Appellant's Motion for Costs and Attorneys' Fees in connection with the above referenced matter. Also enclosed is our firm's check in the amount of \$50.00, representing the motion filing fee. Please file the originals and return one copy to our office via our courier.

By copy of this letter to counsel of record, we are serving same on them.

Respectfully,

A handwritten signature in black ink that reads 'Kelsey Brudvig'. The signature is written in a cursive style with a large, looping 'B'.

Kelsey J. Brudvig

KJB/mmm  
Enclosures

cc (via U.S. Mail and email):  
Stephen B. Samuels, Esquire  
Mark R. Calhoun, Esquire

**RECEIVED**

**JUL 01 2019**

**SC Court of Appeals**