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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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AUG 23 2019
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

Appellate Case No.: 2019-001064

Patricia Pate, Employee/Claimant, Appellant,

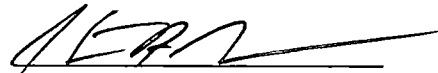
v.

College of Charleston, Employer, and
State Accident Fund, Carrier, Respondents.

MOTION FOR LEAVE TO FILE BRIEF OUT OF TIME

Appellant hereby moves this Honorable Court for leave to file her Initial Brief of Appellant and Designation of Matter out of time. As grounds for granting the motion, Appellant would show that due to inadvertence, the brief was not timely filed nor was an extension granted. The Court graciously informed Appellant of this error and granted leave to file on August 23, 2019. That deadline having been met, Appellant requests the Court grant the motion and accept the filing.

Respectfully Submitted,



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Attorneys for Appellant

August 23, 2019
Columbia, South Carolina

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v.

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PROOF OF SERVICE

I certify that I, Angi Samuels, paralegal for the Samuels Law Firm, LLC, have served the **Motion for Leave to File Brief Out of Time, Initial Brief of Appellant and Designation of Matter** upon counsel for the Respondents College of Charleston and State Accident Fund, by depositing a copy of same in the United States Mail, postage prepaid, on August 23, 2019, addressed as follows:

Margaret M. Urbanic
Clawson & Staubes, LLC
126 Seven Farms Drive Suite 200
Charleston SC 29492-7595

Page P. Hilton
State Accident Fund
Post Office Box 10210
Columbia SC 29221

Mikell H Wyman
Gallivan, White & Boyd, P.A.
Post Office Box 22768
Charleston SC 29413

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

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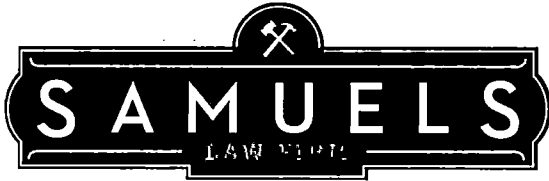
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August 23, 2019



STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

August 23, 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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SC Court of Appeals

RE: Patricia Pate v. College of Charleston and State Accident Fund
Appellate Case No.: 2019-001064

Dear Ms. Kitchings:

Enclosed for filing please find the original and six (6) copies of **Motion for Leave to File and Serve Initial Brief of Appellant Out of Time** in the above-referenced matter. I have also enclosed our firm's check in the amount of Fifty (\$50.00) Dollars as payment of the required filing fee.

We have also enclosed the original and one (1) copy of **Initial Brief of Appellant, Designation of Matter and Proof of Service** for filing. Please date-stamp the extra copy of each and return them to our courier.

By copy of this letter to Margaret Urbanic, Mikell Wyman, Page Hilton, and Kirsten Barr, we are serving counsel of record for the Respondents with a copy of the **Motion, Initial Brief of Appellant and Designation of Matter** as indicated by the attached Proof of Service.

Respectfully,

Daniela Corona
Legal Secretary

/dc

Enclosure(s) as stated

cc: Max Sparwasser, Esquire
Margaret M. Urbanic, Esquire
Mikell H Wyman, Esquire
Page P. Hilton, Esquire
Kirsten L. Barr, Esquire

WE WORK FOR THE PEOPLE WHO WORK.