

90674

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

AUG 26 2019

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION **SC Court of Appeals**

WCC File No. 1708221

Court of Appeals Case No. 2019-000556

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

v.

Michelin North America, Inc., (US7), Employer,  
and Safety National Casualty Corp., Carrier ..... Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENTS**

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Respondents Michelin North America, Inc., (US7), and Safety National Casualty Corp., Carrier, move this Court for an order granting an extension of time for Respondents to serve and file the Initial Respondents' Brief in the above-captioned action.

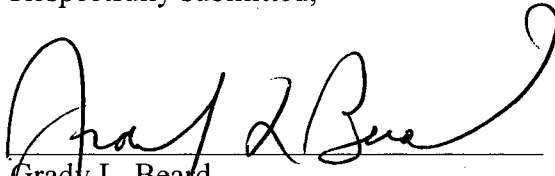
Currently, Respondents' Initial Brief is due on August 30, 2019. The undersigned parties request an extension of time of thirty days to file and serve their Initial Brief. If the Motion for Extension is granted as proposed, the new deadline for the Initial Brief will be September 30, 2019. This is Respondents' first request for an extension of this deadline. Respondents have consulted with Appellant's counsel regarding this request, and Appellant has no objection to the Court's grant of this extension.

RECEIVED

1987

1000

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Grady L. Beard", written over a horizontal line.

Grady L. Beard

Jasmine D. Smith

ROBINSON GRAY STEPP & LAFFITTE, LLC

1310 Gadsden Street

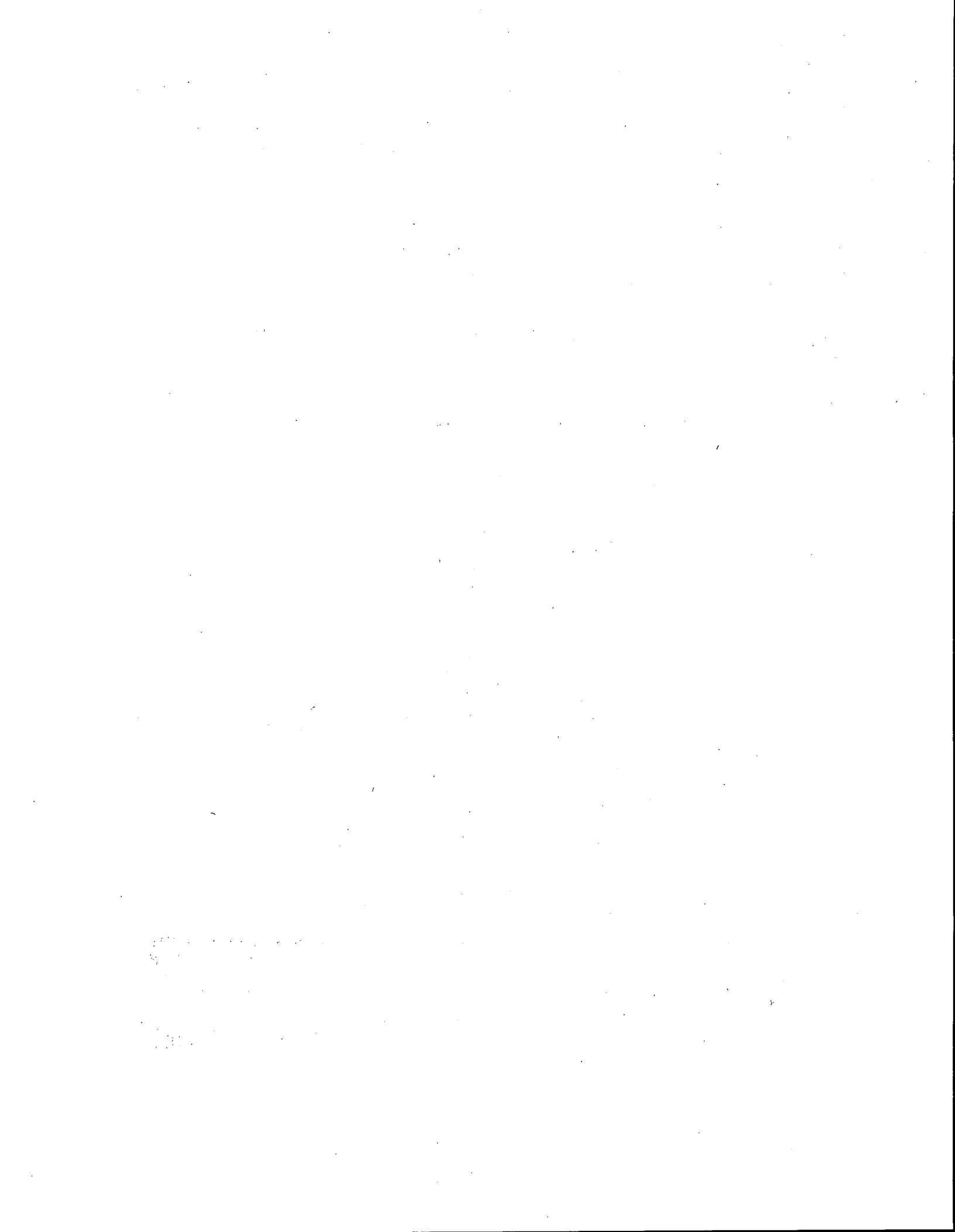
Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

**Attorneys for Respondents**

August 26, 2019



**CERTIFICATE OF SERVICE**

I, the undersigned, Legal Assistant of Robinson Gray Stepp & Laffitte, L.L.C., attorneys for Defendants, do hereby certify that I have served the following parties with the foregoing document(s) by mailing a copy of the same via United States Mail, postage prepaid, and/or hand delivering, or otherwise indicated, to the following address(es):

Pleading(s):

**MOTION FOR EXTENSION TO FILE INITIAL BRIEF**

Parties served:

**VIA HAND DELIVERY**

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street (29201)  
Post Office Box 11629  
Columbia SC 29211

**VIA U.S. MAIL AND E-MAIL**

Stephen B. Samuels, Esquire  
Samuels Law Firm, LLC  
1320 Richland Street  
Columbia SC 29201

  
\_\_\_\_\_  
Cindy Lamb

Columbia, South Carolina

August 26, 2019

**RECEIVED**

**AUG 26 2019**

**SC Court of Appeals**

RECEIVED

1955

PLANT OF THE INDO OR



**ROBINSON  
GRAY**

Litigation + Business

**GRADY L. BEARD**

Direct Dial 803 231.7824

Direct Fax 803 231.7874

Email [gbeard@robinsongray.com](mailto:gbeard@robinsongray.com)

August 26, 2019

**VIA HAND DELIVERY**

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

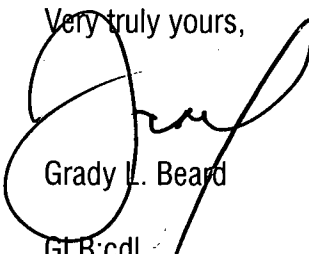
RE: Isaac Brailey v. Michelin North America, Inc.  
WCC File No.: 1708221  
Date of Accident: 06/24/17  
Claim No.: 002550-080240-wc-01  
Our File No.: 6555/8068  
Court of Appeals Case No.: 2019-000556

Dear Ms. Kitchings:

Please find enclosed herewith the original and seven (7) copies of the Motion for Extension to file Respondent's Initial Brief, Designation of Matter, and Proof of Service in the above-referenced matter along with a check in the amount of \$50.00 for the filing fee. We would appreciate your filing the original and six copies of the Motion for Extension and returning a clocked-in copy of the same to us via our courier.

By copy of this letter and aforementioned documents to the claimant's attorney, we are serving him with a copy of the Motion for Extension.

Very truly yours,

  
Grady L. Beard

GLB:cdl

Enclosures

cc: Stephen B. Samuels, Esquire (via U.S. Mail and e-mail)  
Ms. Sharon West (via e-mail)  
Ms. Christie Sirois (via email)  
Mr. Mark Gross (via email)  
Mr. Tim Riddle (via email)

**RECEIVED**

**AUG 26 2019**

**SC Court of Appeals**

