

90873

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
SEP 16 2019  
SC Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1506114

Frankie Padgett, ..... Respondent/Appellant,

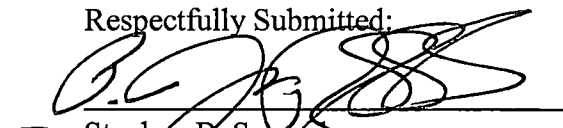
v.

Cast and Crew Entertainment Services, Inc., Employer,  
and American Zurich Insurance Company, Carrier, ..... Appellants/Respondents.

**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 September 13, 2019 as the transcript of hearing was received by counsel on August 14, 2019. If the extension is granted, the Brief will be due on August 2, 2016. As grounds for this Motion, Appellant would show additional time is needed as Counsel is out of the country September 9 - September 26, 2019.

Respectfully Submitted:



For Stephen B. Samuels  
SAMUELS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29250  
(803) 779-4000

September 13, 2019  
Columbia, South Carolina

Counsel for the Appellant

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1506114

**RECEIVED**  
SEP 16 2019  
SC Court of Appeals

Frankie Padgett, ..... Respondent/Appellant,

v.

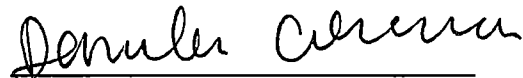
Cast and Crew Entertainment Services, Inc., Employer,  
and American Zurich Insurance Company, Carrier, ..... Appellants/Respondents.

**PROOF OF SERVICE**

I certify that I, Daniela Corona, paralegal for the Samuels Law Firm, LLC, have served the **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 September 13, 2019, addressed as follows:

Vernon F. Dunbar, Esq.  
MCANGUS GOUDELOCK & COURIE, LLC  
P.O. Box 2980  
55 East Camperdown Way, Suite 300 (29601)  
Greenville, SC 29602  
(864) 239-6735  
Vernon.Dunbar@mgclaw.com  
Counsel for the Appellants/Respondents

September 13, 2019

  
\_\_\_\_\_  
Daniela Corona  
SAMUELS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

September 13, 2019

**RECEIVED**  
SEP 16 2019  
SC Court of Appeals

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

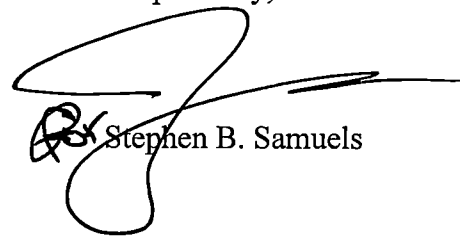
RE: Frankie Padgett v. Cast & Crew Entertainment Services, Inc. and American  
Zurich Insurance Company c/o Zurich North America  
W.C.C. File Number: 1506114

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **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 of Time to file Appellant's Initial Brief, Designation of Matter and Proof of Service and return a clocked copy in the enclosed self-addressed stamped envelope.

Respectfully,



Stephen B. Samuels

Enclosure(s) as stated

cc: Vernon F. Dunbar, Esq.

WE WORK FOR THE PEOPLE WHO WORK.

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSLAWFIRM.NET



1370 RICHLAND STREET  
COLUMBIA, SC 29201

RECEIVED  
SEP 10 2019  
SC Court of Appeals



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

