

90954

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Gene McCaskill; Melody L. James; R. Michael Campbell, II
Workers' Compensation Commissioners

WCC File No: 1423018
Appellate Case No. 2019-000897

RECEIVED
SEP 25 2019
SC Court of Appeals

Giles Long, Claimant, Appellant/Respondent

v.

Metro Construction, Inc., Employer, and American Zurich Ins. Co. and The SC Uninsured
Employers' Fund, Carrier, Defendants,

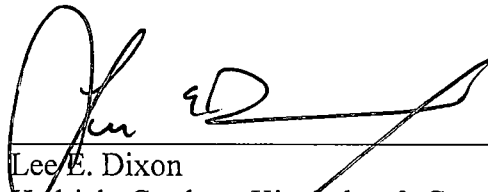
Of which Metro Construction, Inc., Employer, and The SC Uninsured Employers' Fund, Carrier
are Respondents/Appellants,,

and American Zurich Ins. Co. is the Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Pursuant to Rule 240 and Rule 263 of the South Carolina Appellate Court Rules,
Respondent, American Zurich Insurance Company, respectfully requests a thirty (30) day
extension of time to file the Respondent's Initial Brief and Designation of Matter to be Included
in the Record on Appeal. This is Respondent, American Zurich Insurance Company, first
request for an extension of time.

The request is necessitated due to complexity of the numerous claims made by the Appellants. The Brief is currently due on September 27, 2019. If the extension is granted, the Brief will be due on October 27, 2019.

A handwritten signature in black ink, appearing to read "Lee E. Dixon", written over a horizontal line.

Lee E. Dixon
Hedrick, Gardner, Kincheloe & Garofalo, L.L.P.
P.O. Box 11267
Columbia, SC 29211
(803) 727-1200
Attorney for Respondent American Zurich Ins. Co.

Dated: 9/24/19

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE
SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Gene McCaskill; Melody L. James; R. Michael Campbell, II
Workers' Compensation Commissioners

WCC File No: 1423018
Appellate Case No. 2019-000897

RECEIVED

SEP 25 2019

SC Court of Appeals

Giles Long, Claimant, Appellant/Respondent

v.

Metro Construction, Inc., Employer, and American Zurich Ins. Co. and The SC Uninsured
Employers' Fund, Carrier, Defendants,

Of which Metro Construction, Inc., Employer, and The SC Uninsured Employers' Fund, Carrier
are Respondents/Appellants,,

and American Zurich Ins. Co. is the Respondent.

PROOF OF SERVICE

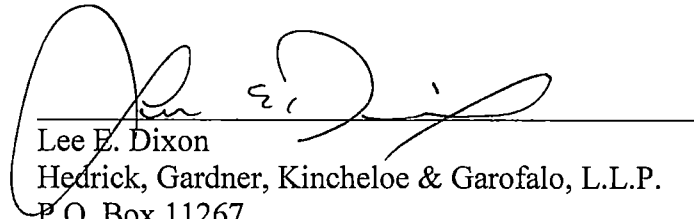
I certify that I have served a Motion for Extension of Time to File Initial Brief and Designation of Matter on the parties in the above referenced claim by depositing a copy of it in the Unites States Mail to their respective attorneys of record, postage prepaid, on September 25, 2019 addressed as follows:

Nicholas G. Callas
Popowski, Callas & Shirley, PA
Post Office Box 7397
Columbia, SC 29202

Timothy B. Killen
Holder Padgett Littlejohn & Prickett, LLC
349 W. Coleman Blvd., Suite 300
Mount Pleasant, SC 29464

Lisa Glover
SC Uninsured Employers Fund
P.O. Box 210039
Columbia, SC 29221

Robert M. Cook II
The Robert Cook Law Firm, LLC
P.O. Box 3575
Batesburg-Leesville, SC 29070



Lee E. Dixon
Hedrick, Gardner, Kincheloe & Garofalo, L.L.P.
P.O. Box 11267
Columbia, SC 29211
(803) 727-1200
Attorney for Respondent American Zurich Ins. Co.



HEDRICK GARDNER
HEDRICK GARDNER KINCHELOE & GAROFALO LLP
ATTORNEYS AT LAW

CHARLOTTE • RALEIGH • WILMINGTON • COLUMBIA

September 25, 2019

V. Claire Allen
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Reply To:
Lee E. Dixon
Special Counsel
1230 Main Street, Suite 325
Columbia, SC 29201
Direct: 803-727-1215
Fax: 803-727-1259
Email: ldixon@hedrickgardner.com

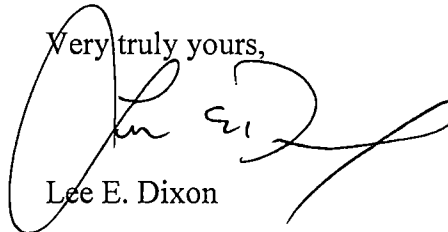
RE: Giles Long v. Metro Construction, Inc.
WCC File No: 1423018
Claim No: E5V6745
Our File No: 00082L.00536

Dear Ms. Allen:

Enclosed for filing please find an original and six (6) copies of Respondent's Motion for Extension of Time of File Initial Brief and Designation of Matter and Proof of Service together with our check, in the amount of \$50.00, to cover the filing fee in the above referenced matter.

By copy of this letter I am herewith serving a copy of the enclosed on all involved counsel. If you have any questions, please let us know. Thank you.

Very truly yours,



Lee E. Dixon

LED/cmh
Enclosure

cc: Nicholas G. Callas, Esquire (via US Mail)
Timothy B. Killen, Esquire (via US Mail)
Lisa Glover, Esquire (via US Mail)
Robert M. Cook, II, Esquire (via US Mail)
Brenda Strong (via email)

RECEIVED

SEP 25 2019

SC Court of Appeals