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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1609593  
Appellate Case No.: 2019-000560

**RECEIVED**  
OCT 14 2019  
SC Court of Appeals

Gena Cain-Davis, Claimant, ..... Appellant,

v.

SC Department of Corrections, Employer, and  
State Accident Fund, Carrier, ..... Respondents.

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

Appellant, by and through her undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file the **Reply Brief of Respondents and Designation of Matter to be included in the Record on Appeal**. The Brief and Designation of Matter are currently due on October 19, 2019. If the Motion is granted, the due date will be extended to November 18, 2019. As grounds for granting this Motion, Appellant would show additional time is needed as counsel has multiple matters pending before this Court, many of which require the filing of briefs and also, just recently returned from traveling out of the country from September 9<sup>th</sup> through September 26, 2019.



Stephen B. Samuels  
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Attorney for Appellant

Columbia, South Carolina  
October 14, 2019

THE STATE OF SOUTH CAROLINA  
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Gena Cain-Davis, Claimant/Appellant,

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S.C. Department of Corrections, Employer and State Accident Fund,  
Carrier,/Respondents.

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**PROOF OF SERVICE**

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I certify that I, Wanda Powell, paralegal for the Samuels Law Firm, LLC, have served the **Motion for Extension of Time to Reply Brief of Respondents and Designation of Matter** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on October 14, 2019, addressed as follows:

Kirsten Leslie Barr, Esquire  
Trask & Howell, L.L.C.  
P.O. Box 2167  
Mt. Pleasant, SC 29465  
843-881-4228  
[kbarr@trask-howell.com](mailto:kbarr@trask-howell.com)  
Counsel for the Appellants/Respondents

October 14, 2019



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Wanda Powell, Paralegal  
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SC Court of Appeals



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

October 14, 2019

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: Gena Cain-Davis v. S.C. Department of Corrections, Employer and State  
Accident Fund, Carrier  
W.C.C. File Number: 1609593  
Appellate Case No. 2019-000560

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the **Motion for Extension of time to file Appellant's Reply Brief of Respondents 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 Reply Brief of Respondents and 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: Kirsten Leslie Barr, Esq.

SBS/wp

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