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STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master-In-Equity

Appellate Case No.: 2019-000984

RECEIVED
OCT 17 2019
SC Court of Appeals

Michael Collins,

Appellant,

v.

Norfolk Southern Railroad Company,

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellants' Initial Brief is currently due October 18, 2019. Due to counsel having been out of town on various other matters, including a death in the family, during the past several weeks and pending trials, Appellant Michael Collins respectfully request a thirty (30) day extension of time to serve and file his Initial Brief. This extension would make the Initial Brief due November 17, 2019. Our firm's check in the amount of \$50.00 for the filing fee is enclosed.

SIGNATURE PAGE FOLLOWS

Respectfully Submitted,



Joseph O. Thickens, S.C. Bar No. 101398
J. Eric Cavanaugh, S.C. Bar No. 100044
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Attorney for Appellant

Other Counsel of Record

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Attorneys for Respondent

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEL FROM YORK COUNTY
Court of Common Pleas

Teasa K. Weaver, Master-In-Equity

Case No.: 2017-CP-46-2574

Michael Collins,

Appellant,

v.

Norfolk Southern Railroad Company,

Respondent.

PROOF OF SERVICE

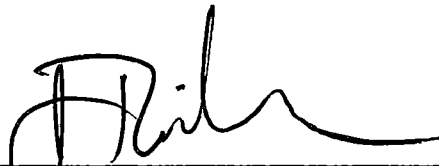
I certify that I have served the Motion for Extension of Time to File Initial Brief on all attorneys of record, bY depositing a copy of it in the United States Mail, postage prepaid on October 15, 2019, addressed to the following:

Ronald K. Wray, II
James A. Bradshaw
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October 15, 2019

Via U.S. Mail and Facsimile to: 803.734.1839

The Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, SC 29201

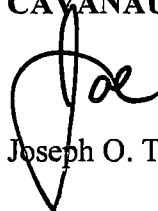
RE: Michael Collins v. Norfolk Southern Corporation
Appellate Case No.: 2019-000984

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of the Appellant's Motion for Extension and Proof of Service. I would appreciate if you would return the clocked copy in the enclosed return envelope.

Yours truly,

CAVANAUGH & THICKENS, LLC



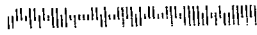
Joseph O. Thickens

JOT/

cc:

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