

91418

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Workers' Compensation Commission

RECEIVED

NOV 12 2019

SC Court of Appeals

WCC File No. 1708221

Appellate Case No.: 2019-000556

Isaac D. Brailey, Claimant, Appellant,

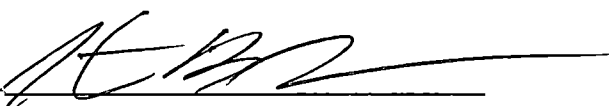
v.

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

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S REPLY 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 Reply Brief of Appellant and Designation of Matter to be included in the Record on Appeal. The Brief is currently due on November 12, 2019. If the extension is granted, the Brief will be due on December 12, 2019. As grounds for 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.

Respectfully Submitted:



Stephen B. Samuels
Samuels Law Firm, LLC
1320 Richland Street
Columbia, SC 29250
(803) 779-4000

November 12, 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. 1708221

Appellate Case No.: 2019-000556

RECEIVED
NOV 12 2019
SC Court of Appeals

Isaac D. Brailey, Claimant, Appellant,

v.

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

PROOF OF SERVICE

I certify that I, Wanda Powell, paralegal for the Samuels Law Firm, LLC, have served the **Motion for Extension of Time to File Appellant's Reply Brief and Designation of Matter** upon counsel for the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on November 12, 2019, addressed as follows:

Grady L. Beard, Esq.
Robinson Gray Stepp & Laffitte, LLC
P.O. Box 11449
Columbia, SC 29211

November 12, 2019



Wanda Powell
SAMUELS LAW FIRM, LLC
1320 Richland Street
Columbia, SC 29201
(803) 779-4000



STEPHEN B. SAMUELS
P. JASON REYNOLDS
ATTORNEYS AT LAW

November 12, 2019

RECEIVED

NOV 12 2019

SC Court of Appeals

Via Hand Delivery

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

RE: Isaac Brailey v. Michelin North America, Inc., et. al.
Appellate Case No.: 2019-000556

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 and Designation of Matter and Proof of Service**, in the above case.

Please have your staff file the Motion for Extension and Proof of Service, then return the extra clocked copy with our courier.

With kindest regards, I am

Respectfully,

Stephen B. Samuels

SBS/wp

cc: Grady Beard, 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