

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

**RECEIVED**

Commissioners Melody L. James, T. Scott Beck, and Aisha Taylor

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NOV 14 2019

SC Court of Appeals

W.C.C. File No. 0908371

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Timothy Hannah, Employee, Claimant ..... Respondent,

v.

MJV, Inc./Butler Trucking, Employer, and  
Palmetto Timber S.I. Fund c/o  
Walker, Hunter & Associates, Inc., Carrier, ..... Appellants.

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**MOTION FOR EXTENSION OF TIME  
IN WHICH TO FILE  
PETITION FOR WRIT OF CERTIORARI**

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Pursuant to Rules 240, 242 and 263(b), SCACR, Appellants MJV, Inc./Butler Trucking and Palmetto Timber S.I. Fund c/o Walker, Hunter & Associates, Inc., hereby request an extension of thirty (30) days in which to file their Petition for Writ of Certiorari with this Court. This Court issued Opinion No. 2019-UP-213 on June 12, 2019. Appellants timely moved for rehearing and a substituted Opinion was filed on October 16, 2019. Consequently, Appellants' Petition currently is due on November 15, 2019.

However, Appellants and Respondent are discussing settling this claim and, while some issues remain to be resolved, the parties are hopeful that they can reach a complete

settlement of this claim. As a result, the parties need additional time in order to conclude settlement negotiations. Counsel for Respondent has consented to this Motion.

**CONCLUSION**

For all the reasons stated herein, Appellants request an extension of thirty (30) days in which to file their Petition for Writ of Certiorari.

Respectfully submitted,

November 11, 2019



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R. Mark Davis, S.C. Bar No.: 15522  
Helen Hiser, S.C. Bar No.: 76124  
MCANGUS, GOUDELOCK & COURIE, LLC  
Post Office Box 650007  
Mt. Pleasant, South Carolina 29465  
(843) 576-2900  
*Attorneys for Appellants MJV, Inc./Butler  
Trucking and Palmetto Timber S.I. Fund c/o  
Walker, Hunter & Associates, Inc.*

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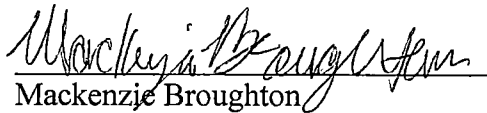
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**PROOF OF SERVICE**

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I certify that I have served the Appellants' **Motion for Extension of Time in Which to File Petition for Writ of Certiorari** on Respondent Timothy Hannah by depositing a copy of it in the United States Mail, postage prepaid, on the 11th day of November, 2019, addressed to his counsel of record as follows:

W.E. Jenkinson, III, Esquire  
Jenkinson, Jarrett & Kellahan, PA  
Post Office Drawer 669  
Kingstree, South Carolina 29556

  
Mackenzie Broughton

Legal Assistant to Helen F. Hiser  
McAngus, Goudelock & Courie LLC  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Appellants MJV, Inc./Butler Trucking  
and Palmetto Timber S.I. Fund c/o Walker, Hunter  
& Associates, Inc.*

**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

November 11, 2019

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: Timothy Hannah v. MJV/Butler Trucking, Inc. and Palmetto Timber S.I.  
Fund c/o Walker, Hunter, and Associates  
Date of Accident: July 14, 2009  
WCC File No.: 0908371  
Our File No.: 2069.10005  
Claim No.: 0001-0593-09-0002  
Appeal No.: 2016-001643

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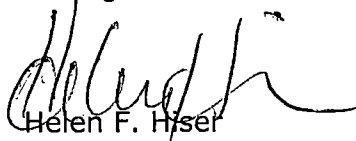
Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of the Appellants' Motion for Extension of Time in Which to File Petition for Writ of Certiorari in the above-referenced matter. In addition, enclosed please find the original and one copy of the Proof of Service. Please file these documents and return a clocked in copy in the enclosed, self-addressed envelope.

Also enclosed is our firm's check in the amount of \$50 for filing the Motion.

If you have any questions, please do not hesitate to contact me.

Sincerely,  
McAngus Goudelock & Courie, LLC

  
Helen F. Hiser

Enclosures

cc: W.E. Jenkinson, III, Esquire



**mgc** | INSURANCE  
DEFENSE

POST OFFICE BOX 65007  
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2069.10005/HFH/mtb  
The Honorable Jenny Abbott Kitching  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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