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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Appellate Case No. 2019-001254

Frankie Padgett, ..... Respondent/Appellant,

v.

Cast and Crew Entertainment Services, Inc., Employer,  
and American Zurich Insurance Company, Carrier, ..... Appellants/Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT**

Respondent, by and through his undersigned attorney, hereby moves before this Honorable Court for a 30-day extension in which to file the Initial Brief of Respondent. The Brief is currently due on February 13, 2020. If the extension is granted, the Brief will be due on March 13, 2020. As grounds for this Motion, Respondent 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

**RECEIVED**

FEB 11 2020

SC Court of Appeals

Counsel for the Respondent

February 11, 2020  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

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SC Court of Appeals

Frankie Padgett, ..... Respondent/Appellant,

v.

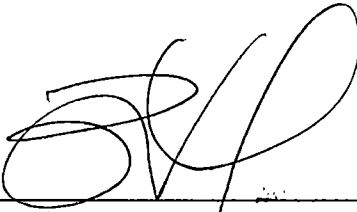
Cast and Crew Entertainment Services, Inc., Employer,  
and American Zurich Insurance Company, Carrier, ..... Appellants/Respondents.

**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 Initial Brief of Respondent** upon counsel for the Appellants by depositing a copy in the United States Mail, postage prepaid on February 11, 2020, addressed as follows:

Vernon F. Dunbar, Esq.  
MCANGUS GOUDELOCK & COURIE, LLC  
P.O. Box 2980  
55 East Camperdown Way, Suite 300 (29601)  
Greenville, SC 29602  
Vernon.Dunbar@mgclaw.com  
Counsel for the Appellants/Respondents

February 11, 2020

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



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

February 11, 2020

***Via hand delivery***

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


RE: Frankie Padgett v. Cast & Crew Entertainment Services, Inc.  
Appellate Case No. 2019-001254

Dear Ms. Kitchings:

Enclosed for filing is the original and (7) copies of the **Motion for Extension of Time to File Initial Brief of Respondent and Proof of Service** in the above case.

Please have your staff file the **Motion for Extension of Time to File Initial Brief of Respondent and Proof of Service** and return a clocked copy to my courier.

Respectfully,



Stephen B. Samuels

Enclosure(s) as stated

cc: Vernon F. Dunbar, Esq. ([via email: vernon.dunbar@mgclaw.com](mailto:vernon.dunbar@mgclaw.com))

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