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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

RECEIVED

The Honorable T. Scott Beck, Commissioner

MAR 23 2020

SC Court of Appeals

W.C.C. File No. 1112328  
Appellate Case No. 2019-001357

Samuel Rose, Claimant.....Respondent,

v.

JJS Trucking, LLC, Uninsured Employer, and Chris Thompson  
Services, Upstream Employer, and Bridgefield Casualty Ins. Co.,  
Carrier for Chris Thompson Services, and The State Accident  
Fund,.....Appellants.

**MOTION FOR EXTENSION OF TIME**

The Record on Appeal is currently due on March 24, 2020. The Respondent's Designation of Matter includes references that are unclear to the Appellants and for which the Appellants have requested clarification from the Respondent. However, the Respondent is unable to provide this information and clarification within the time allotted for the filing of the Record on Appeal. Therefore, in consideration of this issue and further in consideration of the Governor's Emergency Declaration, the Appellants respectfully request a 30 day extension to file the Record on Appeal.

Respectfully submitted,

*Kirsten L. Barr*

March 20, 2020

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Kirsten Leslie Barr  
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Attorneys for Appellants  
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SC Bar #15525

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Services, Upstream Employer, and Bridgefield Casualty Ins. Co.,  
Carrier for Chris Thompson Services, and The State Accident  
Fund,.....Appellants.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that the Motion for Extension to File the Record on Appeal was served on Samuel A. Rose, the South Carolina Uninsured Employers Fund, and JJS Trucking, Inc. by depositing a copy of the same in the United States Mail, first class postage prepaid, on the 20th day of March, 2020, addressed to the legal representatives of the parties of record as follows:

Stephen B. Samuels, Esq.  
1320 Richland Street  
Columbia, SC 29201

Amy V. Cofield, Esq.  
P.O. Box 210039  
Columbia, SC 29221-0039

Cedric Smalls  
JJS Trucking, LLC  
137-A Gordon Street  
Charleston, SC 29403

Lisa Glover, Esq.  
P.O. Box 210039  
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Timothy B. Killen, Esq.  
349 West Coleman Blvd., Suite 300  
Mt. Pleasant, SC 29464

March 20, 2020

*Kirsten L. Barr*

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TRASK  
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WORKERS' COMPENSATION DEFENSE

Reply to  
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MAR 23 2020  
SC Court of Appeals

March 20, 2020


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

Re: Samuel A. Rose v. JJS Trucking, LLC/SCUEF and Chris  
Thompson Services, LLC/Bridgefield Casualty Insurance Company  
**Appellate Case No.: 2019-001357**  
W.C.C. File No.: 1112328  
Carrier File No.: 0196-943450  
Date of Accident: August 10, 2011

Dear Ms. Kitchings:

Enclosed herewith for filing, please find the original and six (6) copies of our Motion for Extension of Time to File the Record on Appeal, along with our original Proof of Service of the same in the above-referenced matter. By a copy of this correspondence, I am serving the other parties of record with a copy of our Motion. Also enclosed, please find our check in the amount of \$50.00 for the filing of this Motion.

Yours very truly,

  
Kirsten L. Barr

KLB/cab/les  
Enc.

cc: Kiema Lewis, Summit Holdings, LLC (w/enc.) (email only-claim faxes)  
Chris Thompson, Chris Thompson Services (w/enc.)  
Susan Mack, Summit Holdings (w/enc.) (email only)  
Mike Jalovec, Summit Holdings (w/enc.) (email only)  
Stephen B. Samuels, Esq. (w/enc.)  
Amy V. Cofield, Esq. (w/enc.)  
Lisa Glover, Esq. (w/enc.)  
Cedric Smalls, JJS Trucking (w/enc.)  
Timothy B. Killen, Esq. (w/enc.)





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TRASK & HOWELL, LLC  
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 MT. PLEASANT, SC 29465

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

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