

In The South Carolina Court of Appeals  
On Appeal From the South Carolina Workers' Compensation Commission  
Appellate Case No: 2019-001936

RECEIVED

MAR 30 2020

SC Court of Appeals

Jennie Cox, Employee

Appellant,

v.

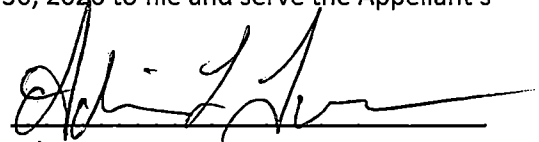
Appellate Case No: 2019-001936

Palmetto State Transportation, Employer  
And Cherokee Insurance Company,  
Respondents

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF**

1. Pursuant to an Order granting Appellant's first Motion for an Extension of Time to File Appellant's Initial Brief, Appellant's initial brief is currently due. Due to recent and ongoing COVID-19 Health Alerts, Shelter in Place Orders, and closures associated with the virus, Counsel has been unable to sufficiently conduct the research necessary to complete the Appellant's Initial Brief. As such, Counsel has not yet had an opportunity to complete the Appellant's Initial Brief.
2. Counsel for Appellant therefore requests an extension of time to file the Appellant's Initial Brief until April 30, 2020.
3. Counsel for Appellant further requests that the applicable deadlines for perfecting the appeal be held in abeyance pending the Court's ruling on this motion.
4. This is Appellant's third motion for an Extension of time with respect to filing the Appellant's Initial Brief.
5. This motion is not being made for purposes of delay; rather, the effects of the recent State and national Health Alerts, as well as Counsel's heavy workload as a solo practitioner has necessitated this request.

Accordingly, Appellant requests an extension of time until April 30, 2020 to file and serve the Appellant's Initial Brief.



Adrienne L. Turner  
Bar # 6840  
Counsel for Appellant

Columbia, SC  
March 27, 2020

CERTIFICATE OF SERVICE

RECEIVED

I certify that a true and correct copy of the Motion to Extend Time for Filing Appellant's Initial Brief was sent by United States Mail, postage prepaid, on March 27, 2020 to:

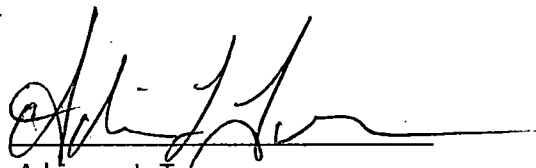
MAR 30 2020

SC Court of Appeals

George D. Gallagher  
PO Box 11669  
Columbia, SC 29211

And

Stephen Stubley, Esquire  
PO Box 11669  
Columbia, SC 29211



Adrienne L. Turner



# Turner Law, LLC

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March 27, 2020

MAR 30 2020

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: Jenny Cox v. Palmetto State Transportation

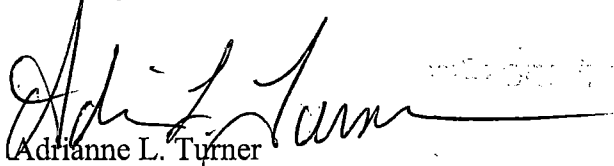
Dear Ms. Kitchings:

Please find enclosed for filing Appellant's Second Motion for Extension of Time to File Appellant's Initial Brief and a check in the amount of fifty dollars (\$50.00) to cover the cost of filing.

By copy of this letter, I am serving the same on counsels of record, George Gallagher Robert Horner and M. Stephen Stubley.

With kind regards, I am

Sincerely,



Adrienne L. Turner

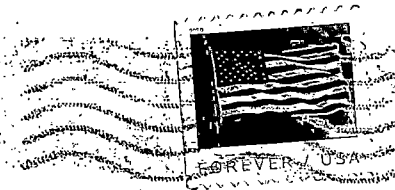
Enclosures

cc: M. Stephen Stubley  
George Gallagher

Turner Law, LLC  
PO Box 210638  
Columbia, SC 29221

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29 MAR 2020 PM 11



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**MAR 30 2020**

**SC Court of Appeals**

The Honorable Jenny Abbott Hitchcock  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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