

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2019-001254
WCC File No. 1506114

RECEIVED

May 14 2020

SC Court of Appeals

Frankie Padgett, Claimant..... Respondent,

v.

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

Appellants' Motion for Extension to File Initial Reply Brief

Appellants, by and through its attorney, hereby move before this Honorable Court for a twenty (20) day extension in which to file an initial reply brief. The reply brief is currently due on May 14, 2020. Appellant's counsel requests additional time in which to submit the brief because of conflicts involving other matters during the ten days which has elapsed since the undersigned received Respondent's initial brief.

Respectfully submitted,



Vernon F. Dunbar

Vernon F. Dunbar
McAngus Goudelock & Courie, LLC
55 East Camperdown Way
Suite 300
Greenville, South Carolina 29601
864-239-6735
vernon.dunbar@mgclaw.com
Attorney for Appellants

CERTIFICATE OF SERVICE

I, the undersigned, Legal Assistant of law offices of McAngus Goudelock & Courie, L.L.P., attorneys for defendants, do hereby certify that I have served counsel of record with the foregoing document(s) by mailing a copy of the same by Fax and United States Mail, postage prepaid, to the following address(es):

Pleading(s):

MOTION FOR EXTENSION

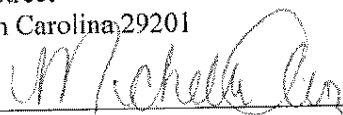
Counsel Served:

Stephen B. Samuels, Esquire
Samuels Reynolds Law Firm
1320 Richland Street
Columbia, South Carolina, 29201

RECEIVED

May 14 2020

SC Court of Appeals



Michelle Avery
Legal Assistant to Vernon F. Dunbar

May 4, 2020



Reply To
VERNON F. DUNBAR
Direct Dial: (864) 239-6735
vernon.dunbar@mgclaw.com

RECEIVED
May 14 2020
SC Court of Appeals

May 14, 2020

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Frankie Padgett v. Cast & Crew Entertainment Services, Inc. and American Zurich Insurance Company c/o Zurich North America
Date of Accident: May 6, 2015
WCC File No.: 1506114
Our File No.: 20216.17069
Claim No.: 2840202414

Dear Ms. Kitchings:

Please find enclosed for filing the original copy of Appellants' Motion for Extension of Time to file the initial reply brief along with proof of service in the above referenced matter.

By copy of this letter to Stephen B. Samuels, attorney for Respondent, I am providing him with a copy of the Motion and advising him if my communication with you.

With kind and warm regards, I remain

Very truly yours,

Vernon F. Dunbar

VFD/_amc
cc: Stephen B. Samuels, Samuels Reynolds Law Firm
Shana'e Montgomery, Zurich North America
Enclosures: Motion for Extension, Filing fee check

McANGUS GOUDELOCK & COURIE LLC

55 EAST CAMPERDOWN WAY
SUITE 300 (29601)
POST OFFICE BOX 2980
GREENVILLE, SC 29602

864.239.4000 PHONE
864.242.3199 FAX
WWW.MGCLAW.COM



Reply To
VERNON F. DUNBAR
Direct Dial: (864) 239-6735
vernon.dunbar@mgclaw.com

RECEIVED

May 14 2020

FAX COVER SHEET

SC Court of Appeals

DATE: May 14, 2020

TO: The Honorable Jenny Abbott Kitchings Fax: (803) 734-1839 Phone: (803) 734-1890

TO: Stephen B. Samuels, Esquire Fax: (803) 779-4004 Phone: (803) 779-4000

FROM: Vernon F. Dunbar

MGC File No.: **20216.17069**

RE: Frankie Padgett v. Cast & Crew Entertainment Services, Inc. and American Zurich Insurance Company c/o Zurich North America
Date of Accident: May 6, 2015
WCC File No.: 1506114
Our File No.: 20216.17069
Claim No.: 2840202414

TOTAL NUMBER OF PAGES INCLUDING COVER: 5

COMMENTS: Attached please find a courtesy copy of Appellants' Motion for Extension of Time. The original, along with the filing fee check, has been sent via US mail.

SHOULD YOU HAVE ANY PROBLEMS RECEIVING THIS FACSIMILE PLEASE CONTACT **MICHELLE AVERY AT (864) 239-6733.**

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS INFORMATION PROTECTED BY ATTORNEY-CLIENT AND/OR THE ATTORNEY/WORK PRODUCT PRIVILEGE. IT IS INTENDED FOR THE USE OF THE INDIVIDUAL NAMED ABOVE AND THE PRIVILEGES ARE NOT WAIVED BY VIRTUE OF THIS HAVING BEEN SENT BY FACSIMILE. IF THE PERSON ACTUALLY RECEIVING THIS FACSIMILE OR ANY OTHER READER OF THE FACSIMILE IS NOT THE NAMED RECIPIENT, ANY USE, DISSEMINATION, DISTRIBUTION OR COPYING OF THE COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U. S. POSTAL SERVICE.