

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

RECEIVED

Jun 02 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 on June 1, 2020. 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. Specifically, Counsel has not been able to access the USC School of Law Library as Counsel would under normal circumstances. 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 July 1, 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. Due to delays caused by COVID-19 Health Alerts, this is Appellant's fifth 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 limited access to resources necessary to conduct research and counsel's heavy workload as a solo practitioner has necessitated this request.

Accordingly, Appellant requests an extension of time until July 1, 2020 to file and serve the Appellant's Initial Brief.

/s/ Adrienne L. Turner

Adrienne L. Turner  
Bar # 6840  
Counsel for Appellant

Greenville, SC  
June 1, 2020

**CERTIFICATE OF SERVICE**

**I certify that a true and correct copy of the Motion to Extend Time for Filing Appellant's Initial Brief was sent by electronic mail and/or United States Mail, postage prepaid, on June 1, 2020 to:**

George Gallagher, Esquire  
[ggallagher@speed-seta.com](mailto:ggallagher@speed-seta.com)  
PO Box 11669  
Columbia, SC 29211  
And  
Stephen Stuble, Esquire  
PO Box 11669  
Columbia, SC 29211

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**Jun 02 2020**  
**SC Court of Appeals**

/s/ Adrienne L. Turner  
Adrienne L. Turner

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v.

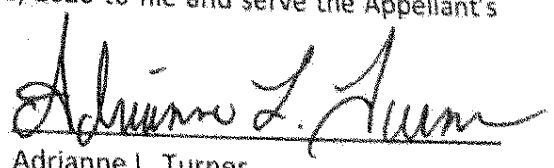
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Accordingly, Appellant requests an extension of time until July 1, 2020 to file and serve the Appellant's Initial Brief.



Adrienne L. Turner  
Bar # 6840  
Counsel for Appellant

Greenville, SC  
~~April 30~~, 2020  
June 1

**FAX COVER SHEET**

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**TO**

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**COMPANY**

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**FAX NUMBER** 18037341839

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**FROM** Adrienne L. Turner

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**DATE** 2020-06-01 20:59:12 GMT

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**RE** Jennie Cox - 2019-001936

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**COVER MESSAGE**

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Good afternoon. Please find attached Appellant's Motion for Extension of Time to File Initial Brief. Attached are copies of the Motion with Counsel's electronic signature as well as a scanned copy with original signature. Please note that I am including Respondent's counsel on this email in order to advise him of the filing of this motion. Please contact me at (803 467-8687 should there be questions or concerns. Thank you.

Adrienne

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