

**RECEIVED****Jul 31 2020****SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE WORKERS' COMPENSATION COMMISSION

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Appellate Case No. 2020-000351

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Gene Grady, Employee, Respondent,

v.

The Shaw Group, Employer, and Zurich American Insurance Company, Carrier,  
Appellants.

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**APPELLANTS' MOTION FOR EXTENSION TO SERVE RECORD ON APPEAL**

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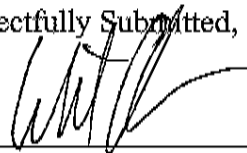
Pursuant to Rule 240, SCACR, Appellants hereby request a 30-day extension to serve the record on appeal. The grounds for the Motion are as follows:

1. Respondent served his initial brief on July 2, 2020; therefore, the record on appeal is due to be served by Appellants on August 3, 2020 (August 1, 2020 is a Saturday). *See* Rule 210(a), SCACR.
2. On July 30, 2020, the parties filed a joint motion to amend their respective designations of matter to correct typographical errors with same and to avoid submitting duplicative material in the record on appeal.
3. The motion to amend the designations of matter is pending before the court.
4. Appellants are unable to construct—and consequently unable to serve—the record on appeal until the Court rules on the motion to amend the designations of matter.

5. As such, Appellants respectfully request an additional 30 days to serve the record on appeal and to file proof of service of same with the clerk.
6. This extension request, if granted, would make the record on appeal due to be served on Respondent and the proof of service filed with the clerk on August 31, 2020.
7. Appellants have consulted with Respondent and he has indicated he has no objection to this request.

Accordingly, Appellants respectfully request that the Court grant their request for a 30-day extension to serve the record on appeal.

Respectfully Submitted,



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Attorneys for Appellants

July 31, 2020

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**CERTIFICATE OF SERVICE**

The undersigned certifies that he served the Motion for Extension to Serve Record on  
Appeal by depositing a copy of same via U.S. mail, postage prepaid, addressed to:

Malcolm M. Crosland, Jr.  
J. Kevin Holmes  
The Steinberg Law Firm, LLP  
P.O. Box 9  
Charleston, SC 29402



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Attorney for Appellants

July 31, 2020



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July 31, 2020

**VIA FACSIMILE (803) 734-1839**

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

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**Jul 31 2020**

**SC Court of Appeals**

*Re: Gene Grady v. The Shaw Group, Inc. and Zurich American Insurance Co.  
Appellate Case No. 2020-000351*

Dear Ms. Kitchings:

Enclosed please find Appellants' Motion for Extension to Serve the Record on Appeal as well as a certificate of service for same. It is my understanding a filing fee is not required for this request. Please do not hesitate to contact me with any additional questions or concerns.

With kind regards,

ELLER TONNSEN BACH, LLC

William F. Childers, Jr.

WFC

Enclosures

cc: Malcolm Crosland, Jr. (via U.S. mail)  
J. Kevin Holmes (via U.S. mail)



**ELLER TONNSEN BACH**  
*Attorneys at Law*

1306 South Church Street • Greenville, South Carolina, 29605

**Date:** *July 31, 2020*

**Deliver To:** *The Honorable Jenny Abbott Kitchings*

**Firm/Company:** *SC Court of Appeals*

**Phone:**

**Fax:** *(803) 734-1839*

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**Jul 31 2020**

**SC Court of Appeals**

**From:** *Katharine Mitchell on behalf of William Childers, Jr.*

**Phone:** *(864) 312-4176 (direct line)*

**Fax:** *(864) 312-4191*

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**Re: Gene Grady v. The Shaw Group, Inc. and Zurich American Insurance Co.**  
**Appellate Case No. 2020-000351**

**Please find attached for filing Appellant's Motion for Extension to Serve the Record on Appeal.**

**Thank you.**

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