

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
OCT 16 2020
SC Court of Appeals

APPEAL FROM APPELLATE PANEL OF THE SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC FILE NO. 1320600

Kevin M. Todd, Employee/Claimant Respondent

vs.

Mike Roberts d/b/a Mike Roberts Home Repair, Employer
and S.C. Uninsured Employers' Fund, Carrier/Defendants

OF WHICH

S.C. Uninsured Employers Fund is the..... Appellant

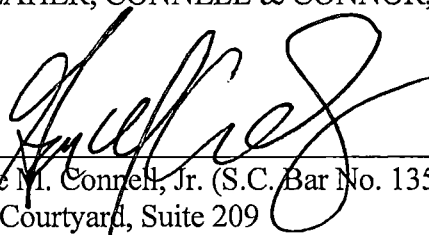
**MOTION FOR EXTENSION TO FILE RESPONDENT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Respondent, moves this Court for an Order extending the time to file Respondent's Initial Brief and Designation of Matter currently due October 18, 2020 in the captioned case. The basis of this Motion is Respondent's counsel's schedule and the fact the courts now require more briefs due to the pandemic. This is Respondent's first request for extension in this matter.

WHEREFORE, Respondent's counsel respectfully requests this Court issue its Order granting Respondent an extension to November 17, 2020 to file Respondent's Initial Brief and Designation of Matter.

Respectfully submitted

KELAHER, CONNELL & CONNOR, P.A.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
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(843) 238-5648 (phone)
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gconnell@classactlaw.net
Attorney for Respondent

October 14, 2020
Surfside Beach, South Carolina

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PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Motion for Extension to File Respondent's Initial Brief and Designation of Matter** on the Respondent, on the 14th day of October, 2020, by depositing a copy of same in the United States Mail, postage prepaid, to:

Samuel T. Brunson, Esquire.
Brunson Law Firm
P.O. Box 431
Florence, SC 29503

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 14th day of October, 2020.

Donna H. Hand
Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS
*OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

October 14, 2020

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

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Re: Appellate Case No. 2020-000923
*Kevin M. Todd v. Michael Roberts d/b/a Michael Roberts Home Repair and
S.C. Uninsured Employers' Fund*
W.C.C. File No. 1320600
Our File No. 2014-0046C

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion for Extension to File Respondent's Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. I also enclose a check for \$50.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

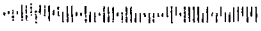
By copy of this letter, we hereby serve a copy of the above-stated documents on Appellant through counsel of record.

Sincerely yours,


Gene M. Connell, Jr.

GMC,Jr:sm
Enclosures

cc: Samuel T. Brunson, Esquire.



KELAHER CONNELL & CONNOR, P.C.
Attorneys at Law
P. O. Drawer 14547
Surfside Beach, SC 29587-4547

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