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Dec 18 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM
THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Appellate Panel Decision

Case No: 2020-200923

Kevin M. Todd,Claimant, Respondent,

V.

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

of which S.C. Uninsured Employers' Fund is the.....Appellant,

MOTION REQUESTING PERMISSION TO FILE AND SERVE RECORD ON APPEAL
OUTSIDE OF FILING DEADLINE

Samuel T. Brunson, Esquire
Post Office Drawer 431
Florence, South Carolina 29503
(843) 669-8111
Attorney for Respondent,
South Carolina Workers' Compensation
Uninsured Employers' Fund

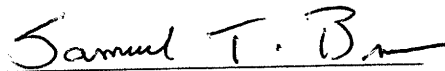
SC Bar No: 9907

The Undersigned hereby moves for permission to file and serve the Record on Appeal outside of the filing deadline pursuant to Rule 210, SCACR on the following grounds:

1. The Undersigned Counsel is a sole practitioner of Law in Florence, South Carolina. His Law Office consists of one Attorney and one support person.
2. On November 16, 2020, the Undersigned Counsel received the Initial Respondent's Brief dated November 9, 2020. Since the closure of the mail processing center in Florence several years ago it has become commonplace for mailings from the Beach area to Florence to take unusual amounts of time. The undersigned counsel was of the belief he had 20 days from receipt of the brief to file a Reply Brief or the Record on Appeal. By email dated December 8, 2020, the Court informed counsel that his belief was in error.
3. The Undersigned Counsel has been in contact with Opposing Counsel regarding an extension to. The Opposing Counsel has stated that he has no objections to any extension.

Wherefore, the Undersigned requests to be allowed to file and serve the record on Appeal outside of the filing deadline.

RESPECTFULLY SUBMITTED,



SAMUEL T. BRUNSON, ESQUIRE
Post Office Drawer 431
Florence, South Carolina 29503
(843) 669-8111
Attorney for Respondent,
South Carolina Workers' Compensation
Uninsured Employers' Fund
SC Bar No: 9907

Florence, South Carolina
December 19, 2020

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM
THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

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Dec 18 2020

SC Court of Appeals

Case No: 2020-200923

Kevin M. Todd, Claimant, Respondent,

V.

Michael Roberts d/b/a Michael Roberts Home Repair, Employer,
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of which S.C. Uninsured Employers' Fund is the Appellant.

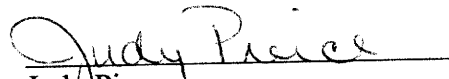
PROOF OF SERVICE

I, Judy Pierce, Secretary to Samuel T. Brunson do hereby certify that I have served the Motion Requesting Permission to File and Serve Record on Appeal Outside of Filing Deadline on the following by depositing a copy of it in the United States Mail, postage prepaid, on December 18, 2020, addressed to:

Mike Roberts dba Mike Roberts Home Repair
3334 New Road
Conway, SC 29526

Gene Connell, Esquire (via-email)
Kelaher Connell & Conner, P.C.
P.O. Drawer 14547
Surfside Beach, SC 29587

December 18, 2020
Florence, South Carolina


Judy Pierce
Secretary to Samuel T. Brunson
Attorney at Law
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