

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

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Jan 15 2021

SC Court of Appeals

Jennie Cox, Employee

Appellant,

v.

Appellate Case No: 2019-001936

**Palmetto State Transportation, Employer
And Cherokee Insurance Company,
Respondents**

MOTION TO EXTEND PRIOR ORDER HOLDING APPEAL IN ABEYANCE OR, IN THE ALTERNATIVE, FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER.

1. By prior order of this Court dated November 23, 2020, the time for filing Appellant's Initial Brief and Designation of Matter was extended for 30 days.
2. Counsel for Appellant inadvertently miscalculated the due date for January rather than December. Counsel only realized the error in calendaring upon being copied on email correspondence to the Court by opposing counsel requesting that the appeal be dismissed, by which time the actual December 23, 2020 deadline had expired.
3. Counsel for Appellant seeks a final Order extending the time for filing the Appellant's Initial Brief and Designation of Matter.
4. Counsel for Appellant stipulates that no further extensions of time for filing the Appellant's Initial Brief and Designation of Matter will be pursued in the absence of the most extraordinary of circumstances.
5. Appellant would further stipulate that any continued efforts at settlement of the matter will not serve as "extraordinary circumstances" supporting further extension of time to file Appellant's Initial Brief and Designation of Matter.
6. 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.
7. This motion is not being made for purposes of delay; rather, Counsel for Appellant's inadvertent calendaring error, as well as counsel's heavy workload as single practitioner, have necessitated the current request.
8. Counsel does not anticipate the need for further extensions beyond the request contained herein.

Accordingly, Appellant requests an extension of time to file Appellant's Initial Brief and Designation of matter.

/s/ Adrienne L. Turner

Adrienne L. Turner
Bar # 6840
Counsel for Appellant

Greenville, SC
January 15, 2021,

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Motion to Hold Appeal in Abeyance or, alternatively, to Extend Time for Filing Appellant's Initial Brief was sent by electronic mail and/or United States Mail, postage prepaid, on January 15, 2021 to:

George Gallagher, Esquire
ggallagher@speed-seta.com
PO Box 11669
Columbia, SC 29211

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/s/ Adrienne L. Turner
Adrienne L. Turner