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Sep 09 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2021-000585

Ana Rodriguez Galvan,
Employee.....Respondent,

v.

Griffin Stafford North Charleston, Employer; Accident Fund General Insurance Company c/o
Accident Fund Insurance Company of America, Hartford Accident & Indemnity Co., and
Employers Preferred Insurance Company, Carrier, Defendants

Of whom, Griffin Stafford North Charleston, Employer and Employers Preferred Insurance
Company, Carrier, are the Appellants

And

Accident Fund General Insurance Company c/o Accident Fund Insurance Company of America
and Hartford Accident & Indemnity Co.

.....Respondents

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF OF RESPONDENTS
GRIFFIN STAFFORD NORTH CHARLESTON AND
HARTFORD ACCIDENT & INDEMNITY CO.

Respondents, by and through the undersigned attorney, hereby move before this Honorable Court an extension in which to file Respondents' Initial Brief. As grounds for this Motion, Respondents would show additional time is needed as the undersigned attorney is working diligently to ascertain assistance with handling the ongoing appeal. Additionally, in the interest of judicial economy, the parties are working efficiently to determine whether the claim may be resolved and the additional time would allow the parties to exhaust that remedy. Respondents respectfully request this Honorable Court allow an extension of time between thirty (30) and forty-five (45) days. Respondents would further note that all above-captioned parties have consented to

the request referenced herein. Respondents thank the Honorable Court for the consideration of such request.



Lynnley D. Ross
Willson Jones Carter & Baxley, P.A.
4922 O'Hear Ave., Suite 301
North Charleston, SC 29405

Attorney for Respondents Griffin
Stafford North Charleston and Hartford
Accident & Indemnity Co.

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PROOF OF SERVICE

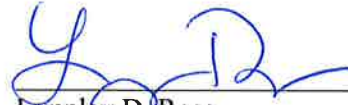
I hereby certify that I have served Respondents' Motion for Extension of Time to File Initial
Brief by depositing a copy in the United States Mail, as well as e-mail, postage prepaid, on
September 9, 2021 addressed to the attorneys of record:

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Via Email and Certified Mail

The Honorable Jenny Abott Kitchings
Clerk of the South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

Re: Ana Rodriguez Galvan vs. Griffin Stafford N. Charleston
Appellate Case No.: 2021-000585
WCC File No.: 1515209 DOI: 10/9/2015
Carrier: Hartford Accident & Indemnity Company - Claim No.: Y97C00172
WJCB File No.: 0100.03662

Dear Ms. Kitchings:

Please find enclosed the original and one (1) copy of Respondents' Motion for Extension of Time to File Initial Brief in the above-referenced matter. I would appreciate you filing the original Motion for Extension of Time to File Initial Brief and returning a clocked copy of the same to my office in the pre-paid envelope enclosed.

By copy of this correspondence and enclosures to all interested parties, I am serving them with a copy of Respondents' Motion for Extension of Time to File Initial Brief.

With kindest regards,
WILLSON JONES CARTER & BAXLEY, P.A.


Lynnley D. Ross

LDR/amt

Enc: Motion for Extension of Time to File Initial Brief
Cc: Michael J. Jordan, Esquire
Regan A. Cobb, Esquire
F. Elliotte Quinn, IV, Esquire