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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.



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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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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

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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September 9, 2021

**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

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**SC Court of Appeals**

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

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